

Exhibit A

1. Plaintiff initiates the instant action to redress violations by Defendants of 42 U.S.C. § 1981, Title VII of the Civil Rights Act of 1964, as amended (“Title VII” – 42 U.S.C.S §§ 2000a *et. seq.*), the Americans with Disabilities Act, as Amended (“ADAAA”), the Age Discrimination in Employment Act (“ADEA” -29 U.S.C. §§ 621 *et. seq.*), and the Family and Medical Leave Act (“FMLA” - 29 U.S.C. §§2601 *et. seq.*) and Plaintiff’s corresponding Pennsylvania state law claims. Plaintiff was unlawfully terminated and suffered damages more fully described herein.

II. Jurisdiction and Venue

2. This action is initiated pursuant to 42 U.S.C. Section 1981. This Court may properly maintain personal jurisdiction over Defendants because Defendants' contacts with this State and this judicial district are sufficient for the exercise of jurisdiction over Defendants to comply with traditional notions of fair play and substantial justice, satisfying the standard set forth by the United States Supreme Court in International Shoe Co. v. Washington, 326 U.S. 310 (1945) and its progeny. This Court has supplemental jurisdiction over Plaintiff's state-law claim(s) because such claim(s) arise out of the same common nucleus of operative facts as his federal claims asserted herein.

3. The United States District Court for the Eastern District of Pennsylvania has original subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because the claims arise under laws of the United States.

4. Venue is properly laid in this District pursuant to 28 U.S.C. sections 1391(b)(1) and (b)(2), because Defendants reside in and/or conduct business in this judicial district and because a substantial part of the acts and/or omissions giving rise to the claims set forth herein occurred in this judicial district.

III. Parties

5. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

6. Plaintiff is an adult with an address as set forth above.

7. Defendants are for-profit legal entities engaged in the business of providing a wide range of cable, internet and telecommunication services internationally.

8. Upon information and belief, because of their interrelation of operations, common ownership or management, centralized control of labor relations, common ownership of financial controls, and other factors, Defendant Entities are sufficiently interrelated and integrated in their activities, labor relations, ownership and management that they may be treated as a single and/or joint employer for purposes of the instant action.

9. At all times relevant herein, Defendants acted by and through their agents, servants, and employees, each of whom acted at all times relevant herein in the course and scope of their employment with and for the benefit of Defendants.

IV. Factual Background

10. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

11. Plaintiff is a fifty-seven (57) year old African American female.

12. Plaintiff was hired by Defendants on or about July 3, 1978.

13. Plaintiff has held various positions during her tenure with Defendants; however, her most recent position was as an Engineer III Specialist.

14. In her most recent position, Plaintiff was generally responsible for the design of telecommunication infrastructure for various residential and business services.

15. This was a vital role within Defendants' Network Operations Engineering Department, which role existed for a least a decade, and this role (and corresponding job responsibilities) continue to be performed in the department where Plaintiff previously worked.

16. In total, Plaintiff worked for Defendants for over thirty-six (36) years before she was subject to a purported reduction in force (*hereinafter* the "RIF") on or about April 23, 2015.

17. Defendants informed Plaintiff that her position was being eliminated because the company was going in a different direction and/or the focus of the company is changing.

18. However, Plaintiff worked at a location (900 Race Street, Philadelphia PA) with six (6) other people, all of whom were non black employees, and were not selected for this RIF.

19. In fact, in or about May or June of 2014 (the second quarter of that year), Defendants brought in a Caucasian individual, David Perry, to perform the same/similar job responsibilities as Plaintiff.

20. The other six (6) individuals in Plaintiff's Department at her same office location were as follows: Anthony Portolese (Caucasian); Joseph Hui (Asian), Steven Murphy (Caucasian), Thomas Hodge (Caucasian), Maria Cesare (Caucasian) and David Perry (Caucasian).

21. Plaintiff had more experience within the engineering department than many of these six (6) individuals; for example, Cesare only had 4 years in the engineering department with Defendants; Perry was an outside foreman and wasn't within engineering previously; and Portolese had only been in engineering for approximately six (6) years.

22. Plaintiff had the most seniority of anyone within her department at the 900 Race Street Location, and had been with the engineering Department for at least 30 years.

23. Defendants allege that performance was a criterion used to assess individuals selected for the RIF.

24. However, Plaintiff's most recent performance evaluation (for 2014) reflects that Defendants' management found her to be performing at a level of "sustained performance meeting objectives, requirements and expectations and periodically exceeding them."

25. Shortly before Plaintiff's RIF, her performance was so stellar that she received a 3% raise, and a significant bonus.

26. Plaintiff had no discipline such that this would have impacted her ability to remain with the company in comparison to her Caucasian peers.

27. In addition, despite that the company was "going in a different direction," Plaintiff's job functions were absorbed equally by Joe Scelsa (Caucasian) and Anthony Portolese (Caucasian) who held the same title as Plaintiff in the engineering department.

28. Steve Murphy (Caucasian) working in Plaintiff's department, at the same location, was admonished for poor performance, and actually had some of his job responsibilities removed which were provided to Plaintiff and another employee in or about the Fall of 2014; yet this individual retained his job over Plaintiff.

29. Joe Scelsa (Caucasian) and Ernest Padovani (Caucasian), both holding the same title as Plaintiff within the engineering department, were dressed down for performance based reasons, yet they retained their positions.

30. During Plaintiff's employment, and within her department, management scrutinized her time and attendance differently than that of her non-black peers. Defendants' management kept a watchful eye over Plaintiff's lunch breaks, and working time, whereas various Caucasian department peers would leave the workplace freely and take well over normal break periods without any type of scrutiny.

31. In addition, at or about the time Plaintiff was subject to a RIF, Defendants RIF'd one black employee, Deidre Johns, within the engineering department who held the position as "engineering consultant"; despite that Ms. Johns' position was purportedly "laid off," Defendants filled the position with a Caucasian male employee by the name of Matt Kehr.

32. Within Plaintiff's organization, Plaintiff is aware that a Caucasian employee in 2014 had been subject to a RIF (Edward McIntosh), however, Defendants immediately found another position for him within the company (in a completely different department – as an Engineering III Specialist) and therefore, this individual's jobs with Defendants was not otherwise impacted.

33. Despite availabilities within the engineering department, which postings are available for viewing, and Plaintiff's efforts to find another job within the company, she has not been successful (despite her tenure and positive work performance history within the company).

Count I
Violations of 42 U.S.C. Section 1981
- Racial Discrimination -

34. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

35. Plaintiff believes Defendants committed violations of 42 U.S.C. Section 1981 for terminating her based on race, where Defendants blatantly hired and retained Caucasian individuals who were either a.) not as qualified as Plaintiff or b.) more properly suited for any purported RIF, based on performance or other objective measurable criterion.

36. Plaintiff's termination therefore constitutes unlawful discrimination under 42 U.S.C. Section 1981.

Count II
Violations of Title VII of the Civil Rights Act of 1964, as amended ("Title VII")
- Racial Discrimination -

37. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

38. Plaintiff believes Defendants committed violations of Title VII for terminating her based on race, where Defendants blatantly hired and retained Caucasian individuals who were either a.) not as qualified as Plaintiff or b.) more properly suited for any purported RIF, based on performance or other objective measurable criterion.

Plaintiff's termination.

39. Plaintiff's termination therefore constitutes unlawful discrimination under 42 U.S.C. Section 1981.

Count III
Violations of the Age Discrimination in Employment Act ("ADEA")
- Age Discrimination -

40. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

41. Plaintiff is an individual over the age of forty (40), and was fully qualified to perform the functions of her job (and did so with positive feedback from management for many years).

42. However, Defendants hired and retained substantially younger candidates to fulfill her job duties, while selecting Plaintiff for a lay off instead of these aforementioned younger employees (despite Plaintiff's lack of discipline, tenure and track record for positive performance).

43. Plaintiff therefore believes Defendants committed violations of ADEA by using her age as a determinative factor in its decision to select her for a lay off.

44. Plaintiff properly exhausted her administrative remedies to proceed with her ADEA claims, as she timely filed a charge of discrimination with the EEOC, filed the instant claims within 90 days of receiving notice of her right to sue.

Count IV
Violations of the Americans with Disabilities Act, as Amended ("ADA")
- Disability Discrimination/Retaliation -

45. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

46. During Plaintiff's employment with Defendants, she Plaintiff suffered from varying disabilities, including but not limited to a shoulder injury beginning in or about April of 2013, which injury required surgery, ongoing treatment and therapy.

47. During all relevant times *herein*, Plaintiff's shoulder injury substantially limited her ability to perform various major life activities, including but not limited to working, lifting, and performing certain manual tasks.

48. Due to Plaintiff's shoulder injury, she requested reasonable accommodations in the form of time off from work (for doctors' appointments related to the injury, surgery and recovery time).

49. Plaintiff was out of work for her shoulder injury from on or about April 26, 2013 through on or about July 15, 2013.

50. During the time that Plaintiff was out on leave, and providing periodic updates to her employer, including that she may need to work on a part time basis until her shoulder injury subsided, Plaintiff was made aware that her manager was threatening that she either return full time or not at all.

51. Plaintiff was also made aware that her health problems were raised during team meetings, including inquiries and concerns by management respecting Plaintiff's recovery time and inability to return to work in prompt fashion.

52. Plaintiff believes Defendants committed violations of ADA by selecting her as a lay off candidate because of her then existing health problems and/or in retaliation for requesting medical accommodations (versus others who did not).

53. Plaintiff properly exhausted her administrative remedies to proceed with her ADA claims, as she timely filed a charge of discrimination with the EEOC, filed the instant claims within 90 days of receiving notice of her right to sue.

Count V
Violations of the Family and Medical Leave Act ("FMLA")
- Retaliation -

54. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full.

55. Plaintiff was an eligible employee under the definitional terms of the Family and Medical Leave Act, 29 U.S.C. § 2611(a)(i)(ii).

56. Plaintiff requested leave from Defendants, her employer, with whom she had been employed for at least twelve months pursuant to the requirements of 29 U.S.C.A § 2611(2)(i).

57. Plaintiff had at least 1,250 hours of service with the Defendants during her last full year of employment.

58. Defendants are engaged in an industry affecting commerce and employs fifty (50) or more employees for each working day during each of the twenty (20) or more calendar work weeks in the current or proceeding calendar year, pursuant to 29 U.S.C.A § 2611(4)(A)(i).

59. Plaintiff was entitled to receive leave pursuant to 29 U.S.C.A § 2612 (a)(1) for a total of twelve (12) work weeks of leave on an intermittent or block basis.

60. Plaintiff took FMLA-qualifying leave from on or about April 26, 2013 through on or about July 15, 2013.

61. Although Defendant allowed Plaintiff to return to work following her FMLA leave, Plaintiff was then selected for a lay-off despite an unblemished record, positive work performance, while others who had not recently taken FMLA leave were not selected for the lay off.

62. Therefore, Plaintiff believes that her FMLA leave was a motivating factor in their decision to select her for a lay off, verses other individuals within her department.

Count VI

**Violations of the Pennsylvania Human Relations Act ("PHRA")
Racial Discrimination, Age Discrimination, Disability Discrimination/Retaliation**

63. The foregoing paragraphs are incorporated herein in their entirety as if set forth in full. Plaintiff re-asserts and re-alleges those facts set forth above with respect to Counts I through IV, which also constitute violations of the PHRA.

64. Plaintiff has properly exhausted her administrative remedies in order to proceed with her PHRA claims, as she properly dual filed her EEOC charge with the Pennsylvania Human Relations Commission, and waited one full year thereafter before proceeding with her PHRA claims in state or federal court.

WHEREFORE, Plaintiff prays that this Court enter an order providing that:

A. Defendants are to compensate Plaintiff, reimburse Plaintiff, and make Plaintiff whole for any and all pay and benefits Plaintiff would have received had it not been for Defendants' illegal actions, including but not limited to back pay, front pay, salary, pay increases, bonuses, medical and other benefits, training, promotions, pension, and seniority. Plaintiff should be accorded those benefits illegally withheld from the date she first suffered the aforesaid unlawful actions at the hands of Defendants until the date of verdict;

B. Plaintiff is to be awarded punitive damages, and/or liquidated as permitted by applicable law, in an amount believed by the Court or trier of fact to be appropriate to punish Defendants for their willful, deliberate, malicious and outrageous conduct, and to deter Defendants or other employers from engaging in such misconduct in the future;

C. Plaintiff is to be accorded any and all other equitable and legal relief as the Court deems just, proper, and appropriate (including but not limited to emotional distress damages);

D. Plaintiff is to be awarded the costs and expenses of this action and reasonable legal fees as provided by applicable federal and state law;

E. Any verdict in favor of Plaintiff is to be molded by the Court to maximize the financial recovery available to Plaintiff in light of the caps on certain damages set forth in applicable federal law;

F. Plaintiff's claims are to receive a trial by jury to the extent allowed by applicable law. Plaintiff has also endorsed this demand on the caption of this Complaint in accordance with Federal Rule of Civil Procedure 38(b).

Respectfully submitted,

KARPF, KARPF, & CERUTTI, P.C.

By: */s/ Christine E. Burke*

Ari R. Karpf, Esq.
Christine E. Burke, Esq.
3331 Street Road
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Bensalem, PA 19020
(215) 639-0801

Dated: May 31, 2016

Exhibit B

In the Matter of:

WALKER

VS.

VERIZON SERVICES CORPORATION, ET AL.

SUZETTE WALKER

August 25, 2016



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SUZETTE WALKER - 8/25/2016

Pages 1 to 4

<p style="text-align: right;">1</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p>3 - - - - -</p> <p>4 SUZETTE WALKER NO. 15-4031 5 vs. 6 VERIZON SERVICES 7 CORPORATION 8 and 9 VERIZON PENNSYLVANIA, INC.</p> <p>10 - - - - -</p> <p>11 Thursday, August 25, 2016</p> <p>12 - - - - -</p> <p>13 Oral Deposition of SUZETTE WALKER, 14 taken at the law offices of Reed Smith, LLP, 15 Three Logan Square, 1717 Arch Street, Suite 16 3100, Philadelphia, Pennsylvania, commencing at 17 11:21 a.m., by and before Robin L. Clark, 18 Registered Professional Reporter and Notary 19 Public in and for the Commonwealth of 20 Pennsylvania.</p> <p>21 - - - - -</p> <p>22 23 24 Job No.: WDC-095861 25</p>	<p style="text-align: right;">3</p> <p>1 I N D E X 2 3 WITNESS PAGE 4 SUZETTE WALKER 5 BY MS. BEGLEY: 6</p> <p>7 8 E X H I B I T S 9 NUMBER DESCRIPTION MARKED 10 Walker 11 Exhibit 1 Charge of Discrimination 12 12 Exhibit 2 2013 Evaluation Bates 82 Def_Walker_001 to 007 13 14 Exhibit 3 Corporate Technology & 96 Network Functional Capabilities Document Bates Def_Walker_024 15 Exhibit 4 2014 Performance Evaluation 126 Bates Def_Walker_008 to 017 16 17 Exhibit 5 Packet Bates P1 to P18 151 18 Exhibit 6 Unemployment Document Bates 180 P46 to P47 19 Exhibit 7 Cochran Letter dated 183 8/18/16 20 21 Exhibit 8 2015 Tax Returns Bates P143 194 to P150 22 Exhibit 9 2014 Tax Return Bates P40 199 to P44 23 24 25</p>
<p style="text-align: right;">2</p> <p>1 APPEARANCES: 2 3 KARPf, KARPf & CERUTTI, P.C. 4 BY: JONATHAN W. CHASE, ESQ. 5 3331 Street Road 6 Two Greenwood Square 7 Suite 128 8 Bensalem, Pennsylvania 19020 9 215-639-0801 10 jchase@karpf-law.com 11 For the Plaintiff</p> <p>12 13 REED SMITH, LLP 14 BY: SARA BEGLEY, ESQ. 15 and VALERIE BROWN, ESQ. 16 1717 Arch Street, Suite 3100 17 Philadelphia, Pennsylvania 19103 18 215-851-8100 19 sbegley@reedsmith.com 20 For the Defendant</p> <p>21 22 ALSO PRESENT: 23 HARVETTA NERO, ESQ. 24 25 - - - - -</p> <p>26 27 28 29 30 31 32 33 34 35</p>	<p style="text-align: right;">4</p> <p>1 E X H I B I T S, continued: 2 NUMBER DESCRIPTION MARKED 3 Walker 4 5 Exhibit 10 2013 Tax Return Bates P34 202 to P39 6 Exhibit 11 2012 Tax Return Bates P28 203 to P33 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

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<p style="text-align: right;">5</p> <p>1 DEPOSITION SUPPORT INDEX</p> <p>2 -----</p> <p>3</p> <p>4 Direction to Witness Not to Answer</p> <p>5 Page Line</p> <p>6 NONE</p> <p>7 Request for Production of Documents</p> <p>8 Page Line</p> <p>9 21 11</p> <p>10 182 15</p> <p>11 Question Marked</p> <p>12 Page Line</p> <p>13 NONE</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">7</p> <p>1 two things. One, speak loudly enough so that I</p> <p>2 can hear you and the court reporter can hear</p> <p>3 you and I might ask you from time to time to</p> <p>4 raise your voice, just so that the record is</p> <p>5 clear.</p> <p>6 The other issue, and I don't</p> <p>7 think this is going to be a problem with the</p> <p>8 two of us, would be that I ask you to allow me</p> <p>9 to complete my question before you answer so</p> <p>10 that our very capable court reporter can take</p> <p>11 down both my question and your answer as she is</p> <p>12 preparing a transcript of today's testimony.</p> <p>13 To the extent that you don't</p> <p>14 understand my question, or you need</p> <p>15 clarification, please ask me to do so and I'll</p> <p>16 do my best to give you a clear question and I</p> <p>17 expect a clear and complete response.</p> <p>18 From time to time, your counsel</p> <p>19 may object and his objection will be on the</p> <p>20 record. I may ask you, following his</p> <p>21 objection, to answer my question. Unless he</p> <p>22 directs you not to answer the question, which</p> <p>23 would be very unusual, you're to go ahead and</p> <p>24 answer the question. Is that understood?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">6</p> <p>1 -----</p> <p>2 STIPULATION OF COUNSEL</p> <p>3 -----</p> <p>4 It is hereby stipulated and agreed</p> <p>5 by and between counsel that the</p> <p>6 reading, signing, certification,</p> <p>7 sealing and filing are waived; and that</p> <p>8 all objections, except as to the form</p> <p>9 of the questions, are reserved until</p> <p>10 the time of trial.</p> <p>11 -----</p> <p>12 SUZETTE WALKER, having been duly</p> <p>13 sworn, was examined and testified as</p> <p>14 follows:</p> <p>15 -----</p> <p>16 BY MS. BEGLEY:</p> <p>17 Q. Good morning, Mrs. Walker. My name</p> <p>18 is Sara Begley and I represent Verizon in the</p> <p>19 lawsuit that you have filed against it. As you</p> <p>20 know, you just took the oath and you're going</p> <p>21 to testify truthfully, honestly and completely,</p> <p>22 correct?</p> <p>23 A. Yes.</p> <p>24 Q. I can already tell you have a soft</p> <p>25 voice and so it will be important for you to do</p>	<p style="text-align: right;">8</p> <p>1 Q. If you would like to take a break</p> <p>2 during the day, that's completely fine. And we</p> <p>3 will take a break for you to get a bite or if</p> <p>4 you need to use the restroom. My only request</p> <p>5 is that if we're in a line of questioning, that</p> <p>6 we complete that line before we take a break.</p> <p>7 Are you under a doctor's supervision at this</p> <p>8 time?</p> <p>9 A. No.</p> <p>10 Q. Are you taking any kind of</p> <p>11 medication today?</p> <p>12 A. No.</p> <p>13 Q. When was the last time you took any</p> <p>14 kind of medication?</p> <p>15 A. Weeks ago.</p> <p>16 Q. Weeks ago. Okay. So you're in</p> <p>17 good health; is that right?</p> <p>18 A. Yes.</p> <p>19 Q. There's nothing that would inhibit</p> <p>20 or restrict your ability to sit today, listen</p> <p>21 to my questions and and answer honorably and</p> <p>22 honestly, correct?</p> <p>23 A. No.</p> <p>24 Q. Let me make sure, I think the</p> <p>25 answer to that should be yes. Let's make sure</p>

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<p style="text-align: right;">9</p> <p>1 we're right about that. You're here today in 2 good shape, right? 3 A. Yes. 4 Q. And you're able to listen to my 5 questions and answers them honestly? 6 A. Yes. 7 Q. Good. Now we're on the saw page. 8 So you were notified of a reduction in force 9 and the termination of your employment on 10 April 23, 2015; is that correct? 11 A. Yes. 12 Q. And you made a notation of that in 13 your personal calendar, correct? 14 A. Yes. 15 Q. And who notified you of the 16 reduction in force? 17 A. Brian Magee. 18 Q. Brian Magee at that time was your 19 manager, correct? 20 A. Yes. 21 Q. And Brian had been your manager 22 since 2008, correct? 23 A. Off and on. 24 Q. Off and on. You had one other 25 manager during the period of time between 2008</p>	<p style="text-align: right;">11</p> <p>1 that charge with the PHRC on May 28, 2015, 2 correct? 3 A. Yes. 4 Q. And your final date of employment 5 at Verizon was May 22, 2015, correct? 6 A. Yes. 7 Q. So your charge was filed within a 8 week of your last day of employment at Verizon, 9 correct? 10 A. Yes. 11 Q. Did you have counsel at this time? 12 A. Yes. 13 Q. And who was your counsel? 14 A. Karpf, Karpf and Cerutti. 15 Q. And was there a specific lawyer at 16 the law firm that you were worked with at the 17 time you filed your charge with the PHRC? 18 A. Yes. 19 Q. And who was that? 20 A. Christine Burke. 21 Q. So I'm going to put you before you 22 Exhibit 1, which is the Charge of 23 Discrimination and some attached documents from 24 the administrative agency and take a look at 25 Exhibit 1, please and is that your signature?</p>
<p style="text-align: right;">10</p> <p>1 and your termination date, which was effective 2 5/23/2015, correct? 3 A. Correct. 4 Q. And that manager was Patricia 5 McCoach, right? 6 A. Yes. 7 Q. And it looks like you reported to 8 Patricia sometime in the 2012 period, right? 9 A. Yes. 10 Q. And my records indicate that you 11 reported to her December 9, 2012; is that 12 right? 13 A. Yes. 14 Q. For how long did you report to 15 Patricia? 16 A. I can't give you an exact time. 17 Q. Was it for a year or was it for 18 less than a year? 19 A. I don't want to guess. 20 Q. Ballpark, you can, I'm not asking 21 you to guess, but was it for months or was it 22 for years? 23 A. Maybe a year. 24 Q. You filed a charge of 25 discrimination with the EEOC and dual filed</p>	<p style="text-align: right;">12</p> <p>1 A. Yes -- 2 Q. -- Ms. Walker, at the bottom of the 3 page? 4 A. Yes. 5 Q. It is, right? 6 A. Yes. 7 ----- 8 (Charge of Discrimination marked 9 Walker Exhibit 1 for identification.) 10 ----- 11 BY MS. BEGLEY: 12 Q. So the document, the first page 13 that is on Exhibit 1, who prepared this 14 document? Who typed it up, do you know? 15 A. My lawyer did. 16 Q. And you provided the information to 17 your lawyer, correct? 18 A. Yes. 19 Q. And after receiving this type of 20 document from your lawyer, you signed the 21 document two times on 5/19/15, correct? 22 A. Yes. 23 Q. And let's read what it says at the 24 bottom, at the left-hand side of page 1 of 25 Exhibit 1, it states I want this charge filed</p>

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Pages 13 to 16

<p style="text-align: right;">13</p> <p>1 with the EEOC and the state or local agency, if</p> <p>2 any. And then it goes onto say, in the second</p> <p>3 sentence after the first paragraph, I declare</p> <p>4 under penalty of perjury that the foregoing is</p> <p>5 true and correct. And then you sign, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And then on the right-hand side of</p> <p>8 the bottom of the page, it says again, I swear</p> <p>9 or affirm that I have read the above charge and</p> <p>10 that it is true to the best of my knowledge,</p> <p>11 information and belief. And that is your</p> <p>12 signature once again, correct?</p> <p>13 A. Yes.</p> <p>14 Q. And it's dated 5/19/15, right?</p> <p>15 A. Yes.</p> <p>16 Q. Let's turn to the next page of</p> <p>17 Exhibit 1, page 2. That is your signature in</p> <p>18 the right-hand side of page 2, correct?</p> <p>19 A. Yes.</p> <p>20 Q. And again, at the bottom of this</p> <p>21 document and it's also dated 5/19/15, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And this paper was also filed with</p> <p>24 your Charge of Discrimination, correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">15</p> <p>1 Charge of Discrimination, you have the</p> <p>2 information about Verizon, correct?</p> <p>3 A. Yes.</p> <p>4 Q. And the third box on page 1 of</p> <p>5 Exhibit 1 it says cause of discrimination,</p> <p>6 check appropriate box, boxes and here you check</p> <p>7 race, right?</p> <p>8 A. Uh-huh, yes.</p> <p>9 Q. Retaliation?</p> <p>10 A. Yes.</p> <p>11 Q. Age?</p> <p>12 A. Yes.</p> <p>13 Q. And disability, correct?</p> <p>14 A. Yes.</p> <p>15 Q. And all of that is true and</p> <p>16 correct, right, that's what you believed?</p> <p>17 A. Yes.</p> <p>18 Q. Date discrimination took place, so</p> <p>19 in the second box, you have latest/all, right</p> <p>20 and under that, in that box, you have</p> <p>21 April 2015, correct?</p> <p>22 A. Yes.</p> <p>23 Q. And under earliest, you don't have</p> <p>24 any dates, correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">14</p> <p>1 Q. And it says once again, I</p> <p>2 understand that false statements in this</p> <p>3 complaint are made subject to the penalties of</p> <p>4 18 Pa.C.S. Section 4904, relating to unsworn</p> <p>5 falsification to authorities, right? That's</p> <p>6 what it says, right?</p> <p>7 A. Yes.</p> <p>8 Q. And that's where you signed your</p> <p>9 signature and dated the document, correct?</p> <p>10 A. Yes.</p> <p>11 Q. So on three separate spaces on your</p> <p>12 Charge of Discrimination, you affirmed that the</p> <p>13 information that you provided in your Charge of</p> <p>14 Discrimination was true and correct, right?</p> <p>15 A. Yes.</p> <p>16 Q. And you understood there were</p> <p>17 penalties for not making correct statements,</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. So let's look at page 1 of the</p> <p>21 Charge of Discrimination. At the top of the</p> <p>22 page, you have your personal information,</p> <p>23 correct?</p> <p>24 A. Yes.</p> <p>25 Q. And the second box on page 1 of the</p>	<p style="text-align: right;">16</p> <p>1 Q. And in the continuing action you</p> <p>2 don't check, under the continuing action, you</p> <p>3 don't check that box either, right?</p> <p>4 A. Right.</p> <p>5 Q. So the latest and all dates that</p> <p>6 discrimination took place were April 2015,</p> <p>7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. Excuse me, that's what you have in</p> <p>10 this document, right?</p> <p>11 A. Yes.</p> <p>12 Q. And that is true and correct?</p> <p>13 A. Right. Yes.</p> <p>14 Q. That all discrimination took place</p> <p>15 in August 2015; is that correct? So let me, so</p> <p>16 all dates that discrimination took place</p> <p>17 against you were in April 2015, correct?</p> <p>18 That's what you have on this box, right?</p> <p>19 A. In the box, yes.</p> <p>20 Q. Yes. And that you swore under</p> <p>21 penalty of perjury was true and correct, right?</p> <p>22 A. Yes.</p> <p>23 Q. So let's look at the statement of</p> <p>24 particulars. It says, I, Suzette Walker, do</p> <p>25 hereby bring this charge against my former</p>

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<p style="text-align: right;">17</p> <p>1 employer for race, age, and disability 2 discrimination, right? That's what it says, 3 right? 4 A. Yes. 5 Q. On the second paragraph it says, "I 6 worked for respondents for over 30 years and 7 from almost a decade as a local manager. 8 Respondents contend that my job was subject to 9 a legitimate reduction in force; however, 10 respondents hired and/or retained both 11 non-black and younger candidates to assume my 12 job responsibilities." That's your claim, 13 right? Is that right? 14 A. Yes. 15 Q. You go on to say, further, during 16 the last year of my employment, I put 17 respondents on notice of a disability and a 18 need for accommodation. Right? 19 A. Yes. 20 Q. So the last year of your employment 21 was 2014, correct? 22 A. Uh-huh. 23 Q. Is that right? 24 A. Yes. 25 Q. Despite, let's go on, despite that,</p>	<p style="text-align: right;">19</p> <p>1 particulars are and it says if additional space 2 is needed, extra sheets can be attached, right? 3 A. Yes. 4 Q. And you don't attach any extra 5 sheets, right? 6 A. No. 7 Q. So this is your entire statement 8 and your entire allegations against Verizon in 9 your Charge of Discrimination, correct? 10 A. Yes. 11 Q. Your final sentence in your 12 allegations where it says, finally, 13 respondents' RIF included a large majority of 14 black employees over the age of 40 and who had 15 not recently sought medical accommodations or 16 notified respondents of disabilities such as I. 17 Who are these individuals that you're referring 18 to? What information do you have that the RIF 19 included a large majority of black employees? 20 A. Other employees that I know of who 21 were RIFed at the same time who are black 22 employees. 23 Q. So tell me, what information do you 24 have that the RIF included a large majority of 25 black employees over the age of 40, what facts</p>
<p style="text-align: right;">18</p> <p>1 respondents contend that certain criterion was 2 used to evaluate proper candidates for this 3 RIF, my tenure and performance was well above 4 that of many of my peers who are not subject to 5 a reduction in force. Finally, respondents' 6 RIF, R-I-F, included a large majority of black 7 employees over the age of 40 and who had not 8 recently medical sought accommodation or 9 notified respondents of disabilities such as I 10 had. That's what you allege, correct? 11 A. Yes. 12 Q. Your final statement is, "Based on 13 the foregoing, I believe respondents' RIF was 14 based on race and/or age and/or my 15 disabilities." That's what you allege; is that 16 correct? 17 A. Yes. 18 Q. "I also respectfully request that 19 the charge be dual filed with the Pennsylvania 20 Human Relations Commission." That is your 21 entire complaint filed with the EEOC, correct? 22 A. Yes. 23 Q. And so up at the top of the space 24 it says the particulars are, looking at where 25 you have your statement of particulars, the</p>	<p style="text-align: right;">20</p> <p>1 I'm looking for, what facts do you have that 2 this RIF included a large majority of black 3 employees that were over the age of 40? 4 A. You want an actual document? 5 Q. No, I want the facts in your head 6 that you based your statement under penalty of 7 perjury that was true and correct who these 8 individuals were? 9 A. There were at least ten employees 10 who were black who were RIFed at the same time 11 that I was. 12 Q. Who are these individuals, can you 13 tell me? 14 A. I can give you some of their names. 15 Q. Okay. 16 A. I can't give you all of their names 17 right now off top of my head. I would have to 18 check my documents. 19 Q. What documents, what documents do 20 you have that you could check? 21 A. I jotted the names down in my 22 planner somewhere. I just have to find it. 23 Q. So would it be in your calendar 24 that you produced to us? 25 A. No, it's not in the calendar. The</p>

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Pages 21 to 24

<p style="text-align: right;">21</p> <p>1 only thing in my calendar is work pertaining to</p> <p>2 Verizon.</p> <p>3 Q. So tell me where is your planner?</p> <p>4 A. It's at home.</p> <p>5 Q. Did you provide your planner to</p> <p>6 your counsel?</p> <p>7 A. No.</p> <p>8 Q. So if you have information about</p> <p>9 your cause of action and individuals --</p> <p>10 A. I will provide it.</p> <p>11 Q. Thank you. So we would like you to</p> <p>12 do that immediately if you would.</p> <p>13 A. Not a problem.</p> <p>14 Q. So tell me when did you start</p> <p>15 maintaining a planner?</p> <p>16 A. I've always had a planner.</p> <p>17 Q. And what sort of information do you</p> <p>18 include in the planner?</p> <p>19 A. Just my doctors' appointments and</p> <p>20 lawyers' appointments and physical exams,</p> <p>21 things of that nature.</p> <p>22 Q. So the calendar that was provided</p> <p>23 to us, was that just a work calendar?</p> <p>24 A. That is a work calendar.</p> <p>25 Q. And was that a document that you</p>	<p style="text-align: right;">23</p> <p>1 A. That because I deal with those</p> <p>2 departments and that's how I knew those</p> <p>3 individuals.</p> <p>4 Q. That's not my question. I</p> <p>5 understand that you knew there were black</p> <p>6 employees that were RIFed, correct?</p> <p>7 A. Yes.</p> <p>8 Q. And you have the names in your</p> <p>9 planner, correct?</p> <p>10 A. Yes.</p> <p>11 Q. My question to you is, if you don't</p> <p>12 know the number of employees that were RIFed,</p> <p>13 how do you know that a large majority of them</p> <p>14 were black and over 40?</p> <p>15 A. I can only tell you about the</p> <p>16 departments that I was in and worked with.</p> <p>17 Q. So that statement is not true then,</p> <p>18 the statement that the RIF included a large</p> <p>19 majority of black employees over 40, you don't</p> <p>20 have that information, right? Are you reading</p> <p>21 the document, Mrs. Walker?</p> <p>22 A. Yes.</p> <p>23 Q. I'm sorry, go ahead. Take your</p> <p>24 time.</p> <p>25 A. Could you repeat your question, I'm</p>
<p style="text-align: right;">22</p> <p>1 kept at work?</p> <p>2 A. Yes.</p> <p>3 Q. So you have a separate personal</p> <p>4 planner, correct?</p> <p>5 A. Yes.</p> <p>6 Q. That you keep other information,</p> <p>7 including information about your meetings with</p> <p>8 your lawyers and some information about your</p> <p>9 lawsuit, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Including information regarding</p> <p>12 other black employees that were terminated in</p> <p>13 connection with the RIF, right?</p> <p>14 A. Yes.</p> <p>15 Q. So that would be relevant to this</p> <p>16 lawsuit and we ask and you've agreed to produce</p> <p>17 it to your counsel.</p> <p>18 How many employees were involved</p> <p>19 in this RIF, do you know?</p> <p>20 A. I cannot give you that number.</p> <p>21 Q. Did you ever know?</p> <p>22 A. No.</p> <p>23 Q. So how did you know the large</p> <p>24 majority were black employees over the age of</p> <p>25 40?</p>	<p style="text-align: right;">24</p> <p>1 sorry.?</p> <p>2 Q. Sure. So I'm going to read once</p> <p>3 again the final factual allegation or the</p> <p>4 almost final factual allegation. Let me</p> <p>5 restate that. The last sentence in</p> <p>6 paragraph 2, "Finally, respondents' RIF</p> <p>7 included a large majority of black employees</p> <p>8 over the age of 40, and who had not recently</p> <p>9 sought medical accommodations or notified</p> <p>10 respondents of disabilities such as I had."</p> <p>11 Right? That's what it says, right?</p> <p>12 A. Yes.</p> <p>13 Q. So my question to you is, do you</p> <p>14 know how many employees were involved in the</p> <p>15 RIF who were -- whose positions were terminated</p> <p>16 as a result of the RIF?</p> <p>17 A. Totally?</p> <p>18 Q. Yes.</p> <p>19 A. No.</p> <p>20 Q. So you don't have that information,</p> <p>21 correct?</p> <p>22 A. Correct.</p> <p>23 Q. And you never had that information,</p> <p>24 correct?</p> <p>25 A. Never provided.</p>

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<p style="text-align: right;">25</p> <p>1 Q. And so you don't -- your statement 2 that the RIF included a large majority of black 3 employees over the age of 40, you don't have 4 information to make, to draw that conclusion, 5 do you? 6 MR. CHASE: Objection. You 7 can answer. 8 BY MS. BEGLEY: 9 Q. Right. You don't have that 10 information, so you can't make, you don't have 11 information about the overall RIF, so you can't 12 conclude that a large majority of black 13 employees over the age of 40 were selected for 14 the RIF, can you? 15 MR. CHASE: Objection. 16 THE WITNESS: No. 17 BY MS. BEGLEY: 18 Q. And so what did you base this 19 statement upon that you knew of certain 20 individuals in your group who were 21 African-American and were RIFed; is that right? 22 A. Based on the people that were, that 23 I was aware of that they were in each 24 department that I dealt with that were RIFed 25 were black.</p>	<p style="text-align: right;">27</p> <p>1 Q. Next. Who? 2 A. Brian Newman. 3 Q. Brian Newman. How old is Brian? 4 A. Over 40. 5 Q. Do you have any information as to 6 whether Brian had taken any kind of medical 7 leave or had any disability? 8 A. I can't make that conclusion. 9 Q. Because you don't have that 10 information, correct? 11 A. Correct. 12 Q. And you never had that information, 13 correct? 14 A. No. 15 Q. Who is next? 16 A. Kevin Johnson. 17 Q. But you said no. Did you ever have 18 information -- 19 A. I said no. 20 Q. You never had, so it's just the way 21 I posed the question. So I'm just restating it 22 for purposes of the record. So did you ever 23 have information about Brian Newman's medical 24 condition or whether he had a disability? 25 A. No.</p>
<p style="text-align: right;">26</p> <p>1 Q. And so and in your journal, what do 2 you call it, your planner? 3 A. Planner. 4 Q. In your planner, you have the name 5 of those black employees, correct? 6 A. Yes. 7 Q. And can you tell me off the top of 8 your head now who those black employees are? 9 A. I can give you five. 10 Q. Can you please do that? 11 A. Diedre Johns. 12 Q. Diedre Johns. Okay. Where was 13 Diedre employed? 14 A. In engineering. 15 Q. Engineering. How old was she? 16 A. Forty-one, 42. I can't tell you. 17 She was over 40. 18 Q. Over 40. And you know that she 19 didn't have any medical issues and didn't take 20 leave in the last two years of her employment, 21 didn't have a disability, do you know that? 22 A. I can't tell you that. 23 Q. You don't know whether she has a 24 disability or not, correct? 25 A. No.</p>	<p style="text-align: right;">28</p> <p>1 Q. Thank you. Next? 2 A. Kevin Johnson. 3 Q. Kevin Johnson. And Kevin was also 4 in engineering? 5 A. No, he was in construction. 6 Q. Construction. And Kevin was 7 African-American? 8 A. Yes. 9 Q. Over 40? 10 A. Yes. 11 Q. Are you aware of whether he had a 12 disability? 13 A. No. 14 Q. Aware of whether he had taken 15 leave? 16 A. No. 17 Q. Who else do you know? 18 A. The name just went right out of my 19 head. The name just flew out of my head. 20 Q. You have four. I have Diedre 21 Johns, Brian Newman, Kevin Johnson, did I miss 22 one? 23 MR. CHASE: No. 24 THE WITNESS: To be 25 accurate, I would rather get my</p>

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<p style="text-align: right;">29</p> <p>1 planner.</p> <p>2 BY MS. BEGLEY:</p> <p>3 Q. That's fine. So as you sit here</p> <p>4 today, you can't recall any other</p> <p>5 African-American employees that were involved</p> <p>6 and terminated as a result of a RIF; is that</p> <p>7 correct?</p> <p>8 A. Correct.</p> <p>9 Q. Your statement the, last portion of</p> <p>10 the sentence in the charge where it says,</p> <p>11 you're referring to the majority of black</p> <p>12 employees over 40 who had been RIFed and you</p> <p>13 said who had not recently sought medical</p> <p>14 accommodation or notified respondents of</p> <p>15 disabilities such as I had.</p> <p>16 You do not now and did not at the</p> <p>17 time you signed this Charge of Discrimination</p> <p>18 have any information about whether any of the</p> <p>19 African-American employees, black employees</p> <p>20 that you knew had sought medical accommodations</p> <p>21 or had notified respondents of disabilities?</p> <p>22 A. No.</p> <p>23 Q. So that statement is not a true and</p> <p>24 correct statement, right? That is not a true</p> <p>25 and correct statement; is that correct?</p>	<p style="text-align: right;">31</p> <p>1 A. No.</p> <p>2 Q. So that allegation, you have no</p> <p>3 firsthand knowledge of, correct?</p> <p>4 A. No.</p> <p>5 Q. All right. And so where you say, I</p> <p>6 swear and affirm that I've read the above</p> <p>7 charge and that it is true and correct to the</p> <p>8 best of my knowledge, information and belief,</p> <p>9 that portion of the sentence is not true and</p> <p>10 correct to the best of your knowledge,</p> <p>11 information and belief, right?</p> <p>12 MR. CHASE: Objection. You</p> <p>13 can answer.</p> <p>14 THE WITNESS: Repeat that.</p> <p>15 BY MS. BEGLEY:</p> <p>16 Q. So we're looking just at the</p> <p>17 second --</p> <p>18 A. No, could you repeat your question?</p> <p>19 I want to make sure I understand what you're</p> <p>20 saying.</p> <p>21 Q. That's absolutely fine. You have</p> <p>22 no information about the, whether any black</p> <p>23 employees that were subject to the RIF had</p> <p>24 sought a medical accommodation or notified</p> <p>25 respondents, or notified Verizon that they had</p>
<p style="text-align: right;">30</p> <p>1 A. Could you repeat that question?</p> <p>2 Q. So my question is, you just</p> <p>3 identified three African-American employees,</p> <p>4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. And in your charge, you said the</p> <p>7 individuals, the black employees that were</p> <p>8 subjected to the RIF were over the age of 40</p> <p>9 and had not recently sought medical</p> <p>10 accommodations or notified respondents of the</p> <p>11 disabilities such as I had. That's what it</p> <p>12 says, right?</p> <p>13 A. Correct.</p> <p>14 Q. And my question to you is, you</p> <p>15 don't presently have -- no, strike that. At</p> <p>16 the time that you signed this document on</p> <p>17 5/19/15, you did not have any information about</p> <p>18 whether any of the black employees that you</p> <p>19 knew, whether they had not recently sought</p> <p>20 medical accommodations or notified respondents</p> <p>21 of disabilities?</p> <p>22 A. They did not disclose that</p> <p>23 information.</p> <p>24 Q. So you never had that information,</p> <p>25 correct?</p>	<p style="text-align: right;">32</p> <p>1 disabilities, correct?</p> <p>2 A. Correct.</p> <p>3 Q. But you have a statement in here,</p> <p>4 in your Charge of Discrimination and the</p> <p>5 statement says that the large majority of black</p> <p>6 employees over the age of 40 and who had not</p> <p>7 recently sought medical accommodations or</p> <p>8 notified respondents of disabilities such as I</p> <p>9 had.</p> <p>10 A. Right.</p> <p>11 Q. You have no information to prove</p> <p>12 that that is a true and correct statement, do</p> <p>13 you?</p> <p>14 A. I can't prove they sought medical</p> <p>15 accommodations, no.</p> <p>16 Q. So that is not a correct statement,</p> <p>17 correct?</p> <p>18 MR. CHASE: Objection.</p> <p>19 THE WITNESS: That is a</p> <p>20 correct statement. I have no knowledge</p> <p>21 of them seeking medical attention, no</p> <p>22 knowledge.</p> <p>23 BY MS. BEGLEY:</p> <p>24 Q. That's not what you said. Right?</p> <p>25 That's not what you attested to. You said the</p>

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<p style="text-align: right;">33</p> <p>1 large majority of black employees over the age</p> <p>2 of 40 and who had not recently sought medical</p> <p>3 accommodations or notified respondents of</p> <p>4 disabilities, that's what you said, right?</p> <p>5 A. Correct.</p> <p>6 Q. And you had no information to --</p> <p>7 and you had no information now to prove that</p> <p>8 that statement is true, do you?</p> <p>9 A. No.</p> <p>10 Q. Turn to page 3 of the EEOC charge,</p> <p>11 please. And up at, actually it's page 2 --</p> <p>12 it's page 4, it's the fourth page in the</p> <p>13 document that you have.</p> <p>14 MR. CHASE: P57 just so</p> <p>15 we're on the same page.</p> <p>16 BY MS. BEGLEY:</p> <p>17 Q. P57, thank you, counsel. And up at</p> <p>18 the top, it says look for work if you are out</p> <p>19 of work, correct?</p> <p>20 A. Correct.</p> <p>21 Q. And this is a document that you</p> <p>22 received in connection with filing the Charge</p> <p>23 of Discrimination with the EEOC, right?</p> <p>24 A. Yes.</p> <p>25 Q. And at some time in the late</p>	<p style="text-align: right;">35</p> <p>1 you filed your Charge of Discrimination?</p> <p>2 MR. CHASE: Any document or</p> <p>3 related to the case?</p> <p>4 MS. BEGLEY: Relating to</p> <p>5 this case.</p> <p>6 THE WITNESS: I don't</p> <p>7 understand the question.</p> <p>8 BY MS. BEGLEY:</p> <p>9 Q. So you filed the Charge of</p> <p>10 Discrimination and you signed it on May 19,</p> <p>11 2015, correct?</p> <p>12 A. Yes.</p> <p>13 Q. And so my question is, did you rely</p> <p>14 on any documents from your employment to</p> <p>15 prepare this Charge of Discrimination or to</p> <p>16 provide information to your counsel regarding</p> <p>17 your Charge of Discrimination?</p> <p>18 A. I don't understand the question.</p> <p>19 Q. Here's your Charge of</p> <p>20 Discrimination Exhibit 1, it's the document,</p> <p>21 flip it over, it's the document right in front</p> <p>22 of you?</p> <p>23 A. Yes.</p> <p>24 Q. Did you rely on any kind of</p> <p>25 documentation, any documents either from your</p>
<p style="text-align: right;">34</p> <p>1 May 2015 time frame, right?</p> <p>2 A. Yes.</p> <p>3 Q. Because you filed it May 28. So up</p> <p>4 at the top of this sheet you received from the</p> <p>5 EEOC, it says "If you lost your job or were not</p> <p>6 hired due to discrimination, you may be</p> <p>7 entitled to the pay or wages you lost.</p> <p>8 However, you cannot receive lost wages unless</p> <p>9 you can show that you looked for another job to</p> <p>10 replace the one you lost or were denied due to</p> <p>11 discrimination. In order to prove you searched</p> <p>12 for work, you must keep copies of all letters,</p> <p>13 e-mails or other evidence of your job search."</p> <p>14 Right?</p> <p>15 A. Yes.</p> <p>16 Q. So you understood from the first</p> <p>17 day that you filed this document that you had</p> <p>18 an affirmative obligation to go out and look</p> <p>19 for a job, right?</p> <p>20 A. Yes.</p> <p>21 Q. And to keep all records of your</p> <p>22 efforts to do so, right?</p> <p>23 A. Yes.</p> <p>24 Q. What documents or information did</p> <p>25 you have in your possession on the date that</p>	<p style="text-align: right;">36</p> <p>1 employment, in your journal to prepare this</p> <p>2 document, the Charge of Discrimination?</p> <p>3 A. The actual form that I was given by</p> <p>4 my manager stating that I was being RIFed.</p> <p>5 Q. So that was the RIF package; is</p> <p>6 that right?</p> <p>7 A. Yes.</p> <p>8 Q. Anything else?</p> <p>9 A. No.</p> <p>10 Q. And that was the most critical</p> <p>11 document, right?</p> <p>12 A. Yes.</p> <p>13 Q. Because that was the basis for your</p> <p>14 claim of discrimination against Verizon,</p> <p>15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. So in your, so I would like you to</p> <p>18 look at your statement of particulars, if you</p> <p>19 would.</p> <p>20 MR. CHASE: It's the first</p> <p>21 page.</p> <p>22 BY MS. BEGLEY:</p> <p>23 Q. That's the first page. Right. You</p> <p>24 don't make any statement in this document that</p> <p>25 during the course of your employment you were</p>

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<p style="text-align: right;">37</p> <p>1 discriminated against, other than the RIF, 2 correct? 3 A. Yes. 4 Q. Excuse me? 5 A. I'm sorry, yes, correct. 6 Q. And there's no allegation in your 7 Charge of Discrimination that anyone at Verizon 8 threatened your job when you were on FMLA leave 9 in 2013, correct? 10 A. Not in this document. 11 Q. And that was the document, again, 12 that you signed under penalty of perjury, 13 correct? 14 A. Correct. 15 Q. And you make no allegation and make 16 no statement in your Charge of Discrimination 17 that anyone at Verizon watched you more closely 18 than other employees with respect, with respect 19 to taking time off for lunch or taking time out 20 of the office, correct? 21 A. Not in this document. 22 Q. And you make no statement that 23 during your employment you were ever treated 24 differently because of your race, do you? 25 A. Not in this document.</p>	<p style="text-align: right;">39</p> <p>1 A. Correct. 2 Q. And you signed it when, again, 3 right at the time that your employment was 4 terminating with Verizon, correct? 5 A. Yes. 6 Q. When events were fresh in your 7 mind, correct? 8 A. Yes. 9 Q. And certainly the events were more 10 fresh in your mind when you signed this 11 document in May 19, 2015, than when you filed 12 your Amended Complaint more than a year later 13 on 6/20/16, correct? 14 A. No. 15 Q. Why is that, you're telling me that 16 your -- 17 A. Those events are glued in my mind. 18 Q. The events are glued in your mind? 19 A. Yes. 20 Q. So they were fresh in your mind on 21 5/19/15 when you signed this document under 22 penalty of perjury, correct; is that right? 23 A. Yes. 24 Q. They were glued into your mind on 25 that date; is that right?</p>
<p style="text-align: right;">38</p> <p>1 Q. And you make no allegation in your 2 Charge of Discrimination that you were ever 3 discriminated against on the basis of your 4 disability, do you? 5 A. Not on this document. 6 Q. And in your Charge of 7 Discrimination, you make no claim that you were 8 retaliated against for taking FMLA leave in 9 2013, do you? 10 MR. CHASE: Objection. You 11 can answer. 12 THE WITNESS: Not in the 13 particulars of this document. 14 BY MS. BEGLEY: 15 Q. And again, this was a statement 16 that you signed under penalty of perjury that 17 it was a true and correct statement, correct? 18 A. Correct. 19 Q. And it is also a statement that you 20 signed within, you signed on 5/19/2015, which 21 was a week before your last day of employment, 22 correct, which was 5/22/15, right? 23 A. Correct. 24 Q. And you signed this under and at 25 the advice of counsel, correct?</p>	<p style="text-align: right;">40</p> <p>1 A. Yes. 2 Q. Yes, we have that as your answer? 3 A. Yes. 4 Q. I'm having a hard time hearing you. 5 And then they remained glued in your mind on 6 6/20/2016, correct, when your Amended Complaint 7 was filed? Oh, pardon me, let me get my dates 8 right, they were glued in your mind on 9 5/21/2016 almost a year after you filed the 10 charge, when you filed your Amended Complaint; 11 is that right? You don't have it in front of 12 you. 13 A. No. 14 Q. So you filed your Amended 15 Complaint, your Second Amended Complaint on 16 5/31/16. One, more than one year after you 17 filed your Charge of Discrimination. Right? 18 A. Yes. 19 Q. But the facts were glued in your 20 mind from day one of your termination, correct? 21 A. Yes. 22 Q. In your Charge of Discrimination, 23 you don't make any allegation that Mr. Magee 24 threatened your job when you were on disability 25 leave, do you?</p>

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<p style="text-align: right;">41</p> <p>1 A. No.</p> <p>2 Q. In your Charge of Discrimination,</p> <p>3 you don't make any allegation that Magee and</p> <p>4 others discussed your disability when you were</p> <p>5 on disability leave, do you?</p> <p>6 A. No.</p> <p>7 Q. In your Charge of Discrimination,</p> <p>8 you make no allegation of any kind of comments</p> <p>9 by Magee of race, age or disability</p> <p>10 discrimination, do you?</p> <p>11 A. No.</p> <p>12 Q. And again, your sole complaint in</p> <p>13 your charge relates to your termination and the</p> <p>14 reduction in force, correct?</p> <p>15 A. Correct.</p> <p>16 Q. And you allege that Verizon</p> <p>17 retained employees that were less qualified and</p> <p>18 younger than you. So let's take a look at</p> <p>19 that.</p> <p>20 A. Excuse me, may I have some more</p> <p>21 water?</p> <p>22 Q. Absolutely. Why don't you just</p> <p>23 keep that over there. So you make a couple of</p> <p>24 statements that I would like to go over with</p> <p>25 you in your Charge of Discrimination. First,</p>	<p style="text-align: right;">43</p> <p>1 A. I believe they're 10 -- Portolese</p> <p>2 is 25 years younger and I believe Joe Scelsa</p> <p>3 and Dave Perry, I'm not sure. I know they're</p> <p>4 ten years or more younger.</p> <p>5 Q. And do you have any facts to</p> <p>6 support that they were retained because of</p> <p>7 their age?</p> <p>8 A. No.</p> <p>9 Q. You also say they are non-black.</p> <p>10 So these three individuals, Portolese, Scelsa</p> <p>11 and Perry are non-black; is that correct?</p> <p>12 A. Yes.</p> <p>13 Q. Do you have any facts to support</p> <p>14 that they were retained because they are</p> <p>15 non-black?</p> <p>16 A. No.</p> <p>17 Q. And who is it that, who is the</p> <p>18 individual that you believe made this decision?</p> <p>19 A. Brian Magee.</p> <p>20 Q. And just Brian Magee; is that</p> <p>21 correct?</p> <p>22 A. And Joe Mucillo.</p> <p>23 Q. And Joe Mucillo?</p> <p>24 A. Yes.</p> <p>25 Q. And what facts do you have that</p>
<p style="text-align: right;">42</p> <p>1 you state in the second portion of the first</p> <p>2 sentence of paragraph 2, "Respondents contend</p> <p>3 that my job was subject to a legitimate</p> <p>4 reduction in force; however, respondents hired</p> <p>5 and/or retained both non-black and younger</p> <p>6 candidates to assume my job responsibilities."</p> <p>7 Who are you referring to in that statement?</p> <p>8 A. Anthony Portolese. And Joe Scelsa</p> <p>9 and David Perry.</p> <p>10 Q. How do you spell Joe's last name?</p> <p>11 A. S-C-E-L-S-A.</p> <p>12 Q. And Portolese, Scelsa and Perry,</p> <p>13 they were all younger than you?</p> <p>14 A. Yes.</p> <p>15 Q. Any over 40?</p> <p>16 A. Out of those three?</p> <p>17 Q. Yes.</p> <p>18 A. No.</p> <p>19 Q. What's your date of birth?</p> <p>20 A. 1/6/59.</p> <p>21 Q. We share the same birth year. So</p> <p>22 you're 57?</p> <p>23 A. Yes.</p> <p>24 Q. And do you have any idea of the</p> <p>25 ages of Portolese, Scelsa or Perry?</p>	<p style="text-align: right;">44</p> <p>1 Brian Magee retained Portolese, Scelsa and</p> <p>2 Perry because they are younger than you?</p> <p>3 A. None.</p> <p>4 Q. And what facts do you have that</p> <p>5 Brian Magee retained Portolese, Scelsa and</p> <p>6 Perry because they are not black?</p> <p>7 A. No actual facts.</p> <p>8 Q. And what facts do you have that</p> <p>9 Magee retained any of the employees that</p> <p>10 weren't subject to the RIF because they are not</p> <p>11 black?</p> <p>12 A. None.</p> <p>13 Q. What facts do you have that Magee</p> <p>14 retained any of the employees in the unit</p> <p>15 because they are younger than you?</p> <p>16 A. Would you repeat that?</p> <p>17 Q. Sure. So your unit was called, you</p> <p>18 were an Engineer III, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And what was your unit called?</p> <p>21 A. Just Philadelphia.</p> <p>22 Q. Philadelphia area?</p> <p>23 A. Area.</p> <p>24 Q. Philadelphia area. So a number of</p> <p>25 Engineer IIIs were retained and you were</p>

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<p style="text-align: right;">45</p> <p>1 terminated, correct?</p> <p>2 A. Correct.</p> <p>3 Q. So my question to you is can you</p> <p>4 identify any specific facts that Brian Magee</p> <p>5 retained any of the Engineer IIIs because</p> <p>6 they're not black?</p> <p>7 A. The entire group of 13 people,</p> <p>8 there's one Asian and everyone else is not</p> <p>9 black.</p> <p>10 Q. So just the fact that they are not</p> <p>11 black, correct?</p> <p>12 A. Yes.</p> <p>13 Q. You have no facts to support that</p> <p>14 he retained them because they were white and</p> <p>15 Asian, right?</p> <p>16 A. No.</p> <p>17 Q. And you have no facts to support</p> <p>18 that Brian retained the group of Engineer IIIs</p> <p>19 because they're younger than you, correct,</p> <p>20 because of their age? You have no facts to</p> <p>21 support that age was a factor that he</p> <p>22 considered in retaining the group of Engineer</p> <p>23 IIIs?</p> <p>24 A. No.</p> <p>25 Q. You have no facts to support that</p>	<p style="text-align: right;">47</p> <p>1 A. Yes.</p> <p>2 Q. Through your doctor, you requested</p> <p>3 an extension of your FMLA leave and Verizon</p> <p>4 through MetLife approved that leave, correct?</p> <p>5 A. Yes.</p> <p>6 Q. You through, you requested an</p> <p>7 opportunity to come back to work on a reduced</p> <p>8 schedule, initially five hours per day and</p> <p>9 Verizon through MetLife approved that reduction</p> <p>10 in hours, the return to work at a reduced</p> <p>11 hourly pace, correct?</p> <p>12 A. No.</p> <p>13 Q. They didn't?</p> <p>14 A. I did return for four hours a day</p> <p>15 first.</p> <p>16 Q. Okay.</p> <p>17 A. And then I went back to the doctor</p> <p>18 and he said I should return for five hours a</p> <p>19 day.</p> <p>20 Q. So when you first came back for</p> <p>21 four days and Verizon allowed you to do so,</p> <p>22 correct?</p> <p>23 A. Four hours a day.</p> <p>24 Q. Four hours a day. What am I</p> <p>25 saying?</p>
<p style="text-align: right;">46</p> <p>1 Brian selected you because you took disability</p> <p>2 leave, correct?</p> <p>3 A. From a statement that he made to</p> <p>4 me.</p> <p>5 Q. What was that statement?</p> <p>6 A. That if I didn't return to work</p> <p>7 after my FMLA, I would no longer have a</p> <p>8 position.</p> <p>9 Q. But you returned, correct?</p> <p>10 A. I had to.</p> <p>11 Q. But you returned to -- so you had,</p> <p>12 so let's talk about this. This is in 2013,</p> <p>13 April of 2013 you had surgery for your</p> <p>14 shoulder, correct?</p> <p>15 A. Correct.</p> <p>16 Q. You had a dislocation and a</p> <p>17 shoulder fracture, correct?</p> <p>18 A. Yes.</p> <p>19 Q. You received surgery from Dr. Getz</p> <p>20 from the Rothman Institute, correct?</p> <p>21 A. Yes.</p> <p>22 Q. Dr. Getz gave you a certain period</p> <p>23 of time you had to be out on leave and Verizon</p> <p>24 through MetLife approved that initial request,</p> <p>25 correct?</p>	<p style="text-align: right;">48</p> <p>1 A. You said four days.</p> <p>2 Q. Pardon me. Thank you for</p> <p>3 correcting me. So you initially returned from</p> <p>4 your FMLA leave on a reduced schedule, correct?</p> <p>5 A. Yes.</p> <p>6 Q. Initially, it was four hours per</p> <p>7 day five days a week, correct?</p> <p>8 A. Yes.</p> <p>9 Q. And that was what the doctor had</p> <p>10 ordered, correct?</p> <p>11 A. Yes.</p> <p>12 Q. And Verizon accepted that, correct?</p> <p>13 A. Yes.</p> <p>14 Q. You continued that for a period of</p> <p>15 time?</p> <p>16 A. Yes.</p> <p>17 Q. Is that right? And then you</p> <p>18 increased the hours to five hours per day five</p> <p>19 days a week; is that correct?</p> <p>20 A. No.</p> <p>21 Q. What --</p> <p>22 A. I was not allowed to increase it to</p> <p>23 five hours a day.</p> <p>24 Q. And why was that?</p> <p>25 A. Because I was told that I had to</p>

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<p style="text-align: right;">49</p> <p>1 come back to work or there would no longer be a 2 position. 3 Q. And was this after, so you had 4 already returned to work at that point, right? 5 A. Yes. 6 Q. So you were working for a period of 7 time -- 8 A. Yes. 9 Q. -- when you received notification 10 that you needed to return to full duty, 11 correct? 12 A. Yes. 13 Q. And who notified you of your 14 obligation to return to full duty? 15 A. Brian Magee. 16 Q. And what did Brian say to you and 17 when? 18 A. He told me that when I went in to 19 speak to him about returning at five hours a 20 day, he said that I had to return full-time or 21 else there would be no position available. 22 Q. And did he tell you that MetLife 23 had contacted him the day before he talked with 24 you -- 25 A. No.</p>	<p style="text-align: right;">51</p> <p>1 Brian Magee that she called me. 2 Q. Well, she left you a voice message 3 and asked you to call her back and gave your 4 you her phone number? 5 A. I never spoke to her. 6 Q. So on the very next day after 7 Kimberly let you a message on 9/17/13, 8 Mr. Magee was notified by Kimberly Astorga that 9 you had reached your max for reduced hours of 10 12 weeks allowed and that period would end on 11 10/4/2013 and that you needed to return to work 12 full-time or go back out on short-term 13 disability. And that she had left you a 14 message to return her call. 15 And then you called Kimberly on 16 9/18/2013 account, and at that time, Kimberly 17 told you that she had tried calling you and you 18 stated to Kimberly that your supervisor told 19 you that you needed to return full-time full 20 duty on 10/7/2013 as the employer only allows 21 12 weeks of reduced hours. She said you 22 indicated that you understood and that you need 23 to speak with your doctor and you would have 24 your doctor send an updated medical. 25 MR. CHASE: Is this a</p>
<p style="text-align: right;">50</p> <p>1 Q. -- and told you that your -- that 2 your reduced schedule opportunity had maxed 3 out? 4 A. No. 5 Q. You did talk with, let's see who 6 you talked with. So on, you dealt with a 7 specific individual, Kimberly Astorga who is a 8 short-term disability claims specialist at 9 MetLife, correct? 10 A. Yes. 11 Q. And you talked with Kimberly the 12 entire time you were out on leave and through 13 your return to work, correct? 14 A. Yes. 15 Q. Kimberly called you on 16 September 17, 2013, at 1:43 p.m. and she 17 notified you that effective 10/1/2013, you no 18 longer had the opportunity to work reduced 19 hours per your work plan and that you would 20 need to return full-time or go back out on 21 short-term disability. And she asked you to 22 call her back, correct? 23 A. No. 24 Q. Okay. So -- 25 A. That was after I had spoken to</p>	<p style="text-align: right;">52</p> <p>1 question or a story? I'm not sure. 2 BY MS. BEGLEY: 3 Q. I'm reading to her MetLife's 4 records and I'm going to have her confirm her 5 conversation with Kimberly. And that you told 6 Kimberly that you are still not 100 percent and 7 you have six more weeks and the employee, you, 8 told Kimberly that you would let her know what 9 was going on after you talked with your doctor. 10 Do you recall that conversation with Kimberly? 11 A. Yes. 12 Q. Yes? 13 A. Uh-huh. 14 Q. And then you returned full-time 15 after that, correct? 16 A. Uh-huh. 17 Q. You didn't go out on short-term 18 disability, right? 19 A. No. 20 Q. You were given the opportunity if 21 you chose to go out on short-term disability, 22 correct? 23 A. Yes. 24 Q. But you made a decision to come 25 back to work full-time?</p>

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<p style="text-align: right;">53</p> <p>1 A. I had to.</p> <p>2 Q. You had to or you could have gone</p> <p>3 on short-term disability, right?</p> <p>4 A. Yes.</p> <p>5 Q. So you made a decision to come back</p> <p>6 to work full-time, right?</p> <p>7 A. Yes.</p> <p>8 Q. From 2008 to your termination in</p> <p>9 2015, May 22 -- no, no, that's not it. From</p> <p>10 the date of, from 2008 until the date you were</p> <p>11 notified of the reduction in force, which was</p> <p>12 April, according to your calendar, April 23,</p> <p>13 2015, you never reported any complaint of any</p> <p>14 nature to anyone in HR about Mr. Magee,</p> <p>15 correct?</p> <p>16 A. Correct.</p> <p>17 Q. From 2008 till April 23, 2015, you</p> <p>18 never complained to anyone that Mr. Magee</p> <p>19 discriminated against you, correct?</p> <p>20 A. Correct.</p> <p>21 Q. From 2008 till April 23, 2015, you</p> <p>22 never complained to HR or to anyone at Verizon</p> <p>23 that Mr. Magee retaliated against you for</p> <p>24 taking disability leave, correct?</p> <p>25 A. No. I'm sorry. Yes.</p>	<p style="text-align: right;">55</p> <p>1 discriminated against you during your course of</p> <p>2 employment at Verizon?</p> <p>3 A. No.</p> <p>4 Q. April 26, 2013, you took FMLA for a</p> <p>5 shoulder injury, correct?</p> <p>6 A. Repeat, could you repeat that date?</p> <p>7 Q. Yeah, I believe it's April 26 --</p> <p>8 A. April 26.</p> <p>9 Q. -- 2013, correct?</p> <p>10 A. Yes.</p> <p>11 Q. So that's two years prior to the</p> <p>12 termination of your employment, correct?</p> <p>13 A. Yes.</p> <p>14 Q. You took leave for a shoulder</p> <p>15 injury, right?</p> <p>16 A. Yes.</p> <p>17 Q. And it was a dislocated shoulder</p> <p>18 and a shoulder fracture; is that right?</p> <p>19 A. Yes.</p> <p>20 Q. And you had, what was it,</p> <p>21 arthroscopic surgery or some other surgery?</p> <p>22 A. It was arthroscopic.</p> <p>23 Q. Arthroscopic surgery. And when you</p> <p>24 first went to Dr. Getz at Rothman, did he say</p> <p>25 it was pretty common surgery?</p>
<p style="text-align: right;">54</p> <p>1 Q. From 2008 till April 23, 2015, you</p> <p>2 never complained to anyone that Mr. Magee</p> <p>3 discriminated against you on the basis of your</p> <p>4 disability, correct?</p> <p>5 A. Correct.</p> <p>6 Q. You never complained to anyone from</p> <p>7 2008 till April 23, 2015 that Mr. Magee engaged</p> <p>8 in any kind of conduct that was unfair,</p> <p>9 correct?</p> <p>10 A. No.</p> <p>11 Q. Did you report to someone that</p> <p>12 Mr. Magee engaged in unfair conduct to you?</p> <p>13 A. No.</p> <p>14 Q. You never did?</p> <p>15 A. No.</p> <p>16 Q. So maybe my question isn't clear,</p> <p>17 so let me just ask it one more time. Did you</p> <p>18 ever between 2008 and April 23, 2015, the date</p> <p>19 that you were notified of the reduction in</p> <p>20 force, make a complaint to anyone of any nature</p> <p>21 against Mr. Magee?</p> <p>22 A. No.</p> <p>23 Q. Between 2008 and April 23, when you</p> <p>24 were notified of the RIF, had you ever made a</p> <p>25 complaint to anyone at Verizon that anyone ever</p>	<p style="text-align: right;">56</p> <p>1 A. No.</p> <p>2 Q. What did he say?</p> <p>3 A. He said he hadn't seen anything,</p> <p>4 all that at one time before. He wasn't, he</p> <p>5 said he didn't realize it was that advanced.</p> <p>6 Q. That advanced. What does that mean</p> <p>7 that advanced?</p> <p>8 A. Where my shoulder was hanging out</p> <p>9 of the socket as well as the fracture and the</p> <p>10 torn rotator cuff.</p> <p>11 Q. And how did that occur? Did you</p> <p>12 have an injury?</p> <p>13 A. I got hit in the arm at a SEPTA</p> <p>14 station.</p> <p>15 Q. With what?</p> <p>16 A. The turnstile.</p> <p>17 Q. With the turnstile?</p> <p>18 A. No, the --</p> <p>19 Q. Oh, going through a turnstile?</p> <p>20 A. Yes.</p> <p>21 Q. And did you go to the hospital when</p> <p>22 you had that injury?</p> <p>23 A. No, I didn't think it was that bad.</p> <p>24 Q. And when did that injury occur?</p> <p>25 A. April 1st.</p>

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<p style="text-align: right;">57</p> <p>1 Q. April 1st of? 2 A. 2013. 3 Q. Of 2013. Did you take any leave 4 between April 1st, 2013 and April 26? 5 A. No. 6 Q. So you continued your normal 7 schedule; is that right? 8 A. Yes. 9 Q. You didn't make any report to 10 anyone at Verizon that you had been injured on 11 April 1st, did you? 12 A. I told them I was in pain, that I 13 had hurt my arm, but that was it. 14 Q. You didn't take any time off until 15 you had your surgery; is that right? 16 A. Correct. 17 Q. Was the injury at SEPTA, were you 18 during working hours? 19 A. No. 20 Q. Were you on your way home? 21 A. Yes. 22 Q. Did you report it to SEPTA and make 23 a claim against SEPTA? 24 A. No, because the person, there was 25 nobody at the booth or anything and when I</p>	<p style="text-align: right;">59</p> <p>1 Q. Did you think of filing a lawsuit 2 against them? 3 A. Yes and no. I didn't think it was 4 as bad as it turned out to be. 5 Q. Once you learned how bad it was, 6 and that you had to have surgery and had to be 7 out of work and you were in pain according to 8 your records with Dr. Getz, you were in pain, 9 didn't you think it was worthwhile to seek 10 advice as to whether you had a lawsuit? 11 A. I did, but I didn't. 12 Q. Did you talk to any lawyer about 13 the injury? 14 A. No. 15 Q. I saw from your interrogatories 16 that you have only been involved in one other 17 lawsuit and it was years ago and it involved an 18 accident that your son was involved in? 19 A. Yes. 20 Q. Is that right? 21 A. Yes. 22 Q. So you haven't been involved in any 23 other lawsuits, this is the only lawsuit you've 24 ever filed; is that correct? 25 A. Yes.</p>
<p style="text-align: right;">58</p> <p>1 called SEPTA, they said, well, they needed to 2 check things out and they never got back to me. 3 Q. Well, couldn't they have pulled 4 videotape or something? 5 A. They told me they couldn't, there 6 was no cameras where I was. 7 Q. Was it something that was defective 8 about the turnstile or did someone push it or 9 what happened? 10 A. She kicked the turnstile. 11 Q. The woman ahead of you? 12 A. Yes. 13 Q. And so that is, that injury that 14 you suffered on April 1st was the injury that 15 was repaired on April 26? 16 A. Yes. 17 Q. And did your insurance cover all of 18 it? 19 A. Yes. 20 Q. Did you feel that you were wronged 21 on April 1st when it occurred? 22 A. Yes. 23 Q. But there was no redress after you 24 had contacted SEPTA? 25 A. No.</p>	<p style="text-align: right;">60</p> <p>1 Q. The one against Verizon. From the 2 date of your termination, which is April 23 to 3 the present, you have not -- what's the date 4 that you left? What was your final day on the 5 job? 6 A. May 22. 7 Q. May 22. So from May 22, 2015, to 8 the present, so we're at the end of 9 August 2016, more than a year, have you had any 10 employment? 11 A. No. 12 Q. Anyplace? 13 A. No. 14 Q. And so what, how do you spend your 15 time? 16 A. I look for jobs. And I volunteer. 17 Q. And where do you volunteer? 18 A. At the school. At the church. 19 Q. What school is that? 20 A. St. Martin de Porres. 21 Q. So what do you do at, is it St. 22 Marks? 23 A. St. Martin de Porres. 24 Q. So what do you do at St. Martin? 25 A. When they have events I help clean</p>

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<p style="text-align: right;">61</p> <p>1 up, set up.</p> <p>2 Q. How often is that?</p> <p>3 A. Maybe once or twice a month.</p> <p>4 Q. And then you also volunteer at your</p> <p>5 church?</p> <p>6 A. Uh-huh.</p> <p>7 Q. And what church is that?</p> <p>8 A. The Charles Memorial Baptist</p> <p>9 Church.</p> <p>10 Q. And how often do you volunteer and</p> <p>11 in what capacity?</p> <p>12 A. Whenever needed, whether it's</p> <p>13 cleanup, monitoring, helping with different</p> <p>14 items. It depends on what's needed.</p> <p>15 Q. So a couple of times a month?</p> <p>16 A. Once or twice a month, yes.</p> <p>17 Q. Do you have kids?</p> <p>18 A. Yes.</p> <p>19 Q. How old are your kids?</p> <p>20 A. Thirty-four.</p> <p>21 Q. Thirty-four?</p> <p>22 A. Yes.</p> <p>23 Q. Is your -- is it a son or a</p> <p>24 daughter?</p> <p>25 A. Son.</p>	<p style="text-align: right;">63</p> <p>1 home?</p> <p>2 A. No.</p> <p>3 Q. Do you own any other properties?</p> <p>4 A. No.</p> <p>5 Q. What does Eric do for a living?</p> <p>6 A. He's retired.</p> <p>7 Q. And how old is he?</p> <p>8 A. Fifty-seven.</p> <p>9 Q. Where is he retired from?</p> <p>10 A. The state.</p> <p>11 Q. Of Pennsylvania?</p> <p>12 A. Yes.</p> <p>13 Q. And what did he do while he was</p> <p>14 working?</p> <p>15 A. He worked for the Commonwealth as</p> <p>16 a -- Labor and Industry.</p> <p>17 Q. I'm sorry?</p> <p>18 A. In Labor and Industry.</p> <p>19 Q. And does he have an full pension</p> <p>20 and retirement package from the state?</p> <p>21 A. Yes.</p> <p>22 Q. Does it include medical benefits?</p> <p>23 A. No.</p> <p>24 Q. How do you cover your medical</p> <p>25 benefits?</p>
<p style="text-align: right;">62</p> <p>1 Q. Son. Does he live at home?</p> <p>2 A. No.</p> <p>3 Q. Are you married?</p> <p>4 A. Yes.</p> <p>5 Q. And what's your husband's name?</p> <p>6 A. Eric.</p> <p>7 Q. Eric what?</p> <p>8 A. Walker.</p> <p>9 Q. Eric Walker. How long have you</p> <p>10 been married to Eric?</p> <p>11 A. Thirty-six years.</p> <p>12 Q. And where do you live?</p> <p>13 A. In north Philadelphia.</p> <p>14 Q. And are you at the same address</p> <p>15 that you were at when you were employed by</p> <p>16 Verizon?</p> <p>17 A. Yes.</p> <p>18 Q. And what is that?</p> <p>19 A. 2748 Judson Street.</p> <p>20 Q. And how long have you lived at that</p> <p>21 address?</p> <p>22 A. Thirty-four years.</p> <p>23 Q. And do you own your home?</p> <p>24 A. Yes.</p> <p>25 Q. Do you have any mortgage on the</p>	<p style="text-align: right;">64</p> <p>1 A. I pay for them.</p> <p>2 Q. And out of what money do you pay</p> <p>3 for them?</p> <p>4 A. My 401K.</p> <p>5 Q. And how much is in your 401K?</p> <p>6 A. I have no idea right now.</p> <p>7 Q. Is it invested someplace?</p> <p>8 A. Yes.</p> <p>9 Q. And where is it invested?</p> <p>10 A. At SCI.</p> <p>11 Q. Do you have any other sources of</p> <p>12 income?</p> <p>13 A. No.</p> <p>14 Q. Other than -- is your only source</p> <p>15 of income your 401K and your husband's pension?</p> <p>16 A. Uh-huh. Yes, I'm sorry, yes.</p> <p>17 Q. And has, how do you live day to</p> <p>18 day? Are you living day to day on your 401K</p> <p>19 and your husband's pension?</p> <p>20 A. Yes.</p> <p>21 Q. Do either one of you have any plans</p> <p>22 of getting a job?</p> <p>23 A. I'm job hunting now.</p> <p>24 Q. Have you hired a recruiter, an</p> <p>25 outplacement company to help you find a job?</p>

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<p style="text-align: right;">65</p> <p>1 A. No. I actually search on various</p> <p>2 sites. I have been on a couple job interviews,</p> <p>3 but I actively search every day.</p> <p>4 Q. And what job sites do you actively</p> <p>5 search every day?</p> <p>6 A. CareerBuilder, Indeed, Monster,</p> <p>7 ZipRecruiter, LinkLine, various other ones.</p> <p>8 Q. And what type of positions are you</p> <p>9 looking for?</p> <p>10 A. Anything.</p> <p>11 Q. Are you looking for a certain</p> <p>12 region, like the City of Philadelphia?</p> <p>13 A. In Philadelphia, yes.</p> <p>14 Q. Is your husband, he's still a</p> <p>15 relatively young man. Because of your current</p> <p>16 situation that you're not working, is he</p> <p>17 looking to go back to work?</p> <p>18 A. Yes.</p> <p>19 Q. Does he have any other source of</p> <p>20 income? Does he do any side jobs?</p> <p>21 A. No, not anymore.</p> <p>22 Q. And so since when, did he have side</p> <p>23 jobs before?</p> <p>24 A. 2013.</p> <p>25 Q. And what did he do in 2013?</p>	<p style="text-align: right;">67</p> <p>1 to do so and has a garage he can work out of?</p> <p>2 A. Sometimes he can, but lately, it's</p> <p>3 been a problem.</p> <p>4 Q. What's been a problem?</p> <p>5 A. His father just died.</p> <p>6 Q. How did his father die?</p> <p>7 A. Cancer.</p> <p>8 Q. Cancer?</p> <p>9 A. Yes.</p> <p>10 Q. Did you two take care of the</p> <p>11 father?</p> <p>12 A. Yes.</p> <p>13 Q. Did he live in your home while he</p> <p>14 was sick?</p> <p>15 A. No.</p> <p>16 Q. Where did he live?</p> <p>17 A. Around the corner.</p> <p>18 Q. I can't hear you.</p> <p>19 A. Around the corner.</p> <p>20 Q. Around the corner. Is your</p> <p>21 father's mom still alive?</p> <p>22 A. No.</p> <p>23 Q. So who else helped you take care of</p> <p>24 the father?</p> <p>25 A. Just my husband, myself and my</p>
<p style="text-align: right;">66</p> <p>1 A. He was a mechanic.</p> <p>2 Q. And is he a skilled mechanic, a</p> <p>3 licensed mechanic?</p> <p>4 A. Yes.</p> <p>5 Q. So he could go back to being a</p> <p>6 mechanic if he chose?</p> <p>7 A. Yes.</p> <p>8 Q. But you have been able to make ends</p> <p>9 meet and he hasn't needed to do that between</p> <p>10 2013 and today's date?</p> <p>11 A. Yes.</p> <p>12 Q. Is he associated with a garage or</p> <p>13 does he own a garage?</p> <p>14 A. He's associated with a garage.</p> <p>15 Q. And what garage is that?</p> <p>16 A. It's a small garage owned by a</p> <p>17 friend.</p> <p>18 Q. And what's the friend's name?</p> <p>19 A. Mark. I can't think of his last</p> <p>20 name.</p> <p>21 Q. And where is his garage located?</p> <p>22 A. Broad and Pike Streets.</p> <p>23 Q. So you were terminated in 2015, and</p> <p>24 from 2015 until now, he hasn't been working as</p> <p>25 a mechanic despite the fact that he's licensed</p>	<p style="text-align: right;">68</p> <p>1 brother-in-law.</p> <p>2 Q. You allege in your complaint that</p> <p>3 you've suffered emotional distress as a result</p> <p>4 of your termination. Are you treating with a</p> <p>5 physician for your emotional distress?</p> <p>6 A. No.</p> <p>7 Q. No. Did you ever go to a</p> <p>8 psychiatrist, a psychologist, any kind of</p> <p>9 medical healthcare provider regarding the</p> <p>10 emotional distress that you were, that you</p> <p>11 claim you're suffering from?</p> <p>12 A. No.</p> <p>13 Q. Have you taken any kind of</p> <p>14 medication from the time you were terminated to</p> <p>15 the present to help with the emotional distress</p> <p>16 that you're suffering from?</p> <p>17 A. Repeat that.</p> <p>18 Q. Yeah. Have you taken any</p> <p>19 medication, so you claim that you're suffering</p> <p>20 from emotional distress; is that right?</p> <p>21 A. Yes.</p> <p>22 Q. And tell me what that emotional</p> <p>23 distress is that you've suffered from as a</p> <p>24 result of your termination?</p> <p>25 A. Just the whole concept of working</p>

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Pages 69 to 72

<p style="text-align: right;">69</p> <p>1 for years, doing and giving 150 percent and 2 then being told you're no longer needed, that 3 we're going in a different direction and having 4 to get back into the job market after being out 5 of it for 37 years. Working for the same 6 company, doing various jobs, now jumping back 7 into a job market that's very slim and it's 8 very hard to find a job after you get a certain 9 age. So it's very frustrating and very, it 10 disheartened me.</p> <p>11 Q. I couldn't hear you. 12 A. I'm disheartened as to finding 13 another job, but I'm still searching.</p> <p>14 Q. And you have been searching really 15 from day one? 16 A. Diligently.</p> <p>17 Q. And you're looking for a job; is 18 that right? 19 A. Yes.</p> <p>20 Q. You want to work? 21 A. Yes, I love to work.</p> <p>22 Q. Have you also been looking to go 23 back to school? 24 A. Yes.</p> <p>25 Q. I've seen something from an</p>	<p style="text-align: right;">71</p> <p>1 A. Mr. Mucillo.</p> <p>2 Q. Mr. Mucillo, how much did you 3 interact with him? 4 A. Only when there was a customer 5 service issue.</p> <p>6 Q. And how would you describe your 7 relationship during your employment with Mr. 8 Mucillo? 9 A. I never really spoke to him.</p> <p>10 Q. I can't hear you. 11 A. I never really spoke to him. Just 12 professional, common courtesy and respect.</p> <p>13 Q. So perfectly fine, correct? 14 A. Correct.</p> <p>15 Q. And you never made a complaint 16 about Mr. Mucillo during your employment at 17 Verizon, correct? 18 A. No.</p> <p>19 Q. And you have no facts to support 20 that Mr. Mucillo engaged in any kind of 21 discrimination against you on the basis of your 22 race, your age or your disability, correct? 23 A. No.</p> <p>24 Q. So let me just state that. Do you 25 have any facts that Mr. Mucillo discriminated</p>
<p style="text-align: right;">70</p> <p>1 American International University online, tell 2 me about that? 3 A. I figured I would go into a 4 different direction.</p> <p>5 Q. What direction is that? 6 A. Hospitalization.</p> <p>7 Q. So in the like the healthcare 8 field? 9 A. In that field, yes.</p> <p>10 Q. And what would you do? Would it be 11 nursing or admin? What would it be? 12 A. Whatever I can become involved in.</p> <p>13 Q. Did you apply for a job at Comcast? 14 A. No.</p> <p>15 Q. Why not? 16 A. I feel a little, I still hold a 17 sense of one, a kinship with Verizon products.</p> <p>18 Q. How would you describe your 19 relationship with Brian Magee? 20 A. I thought we had a good working 21 relationship.</p> <p>22 Q. And so until he terminated you, you 23 never had an issue with him, correct? 24 A. Never.</p> <p>25 Q. And Brian's boss?</p>	<p style="text-align: right;">72</p> <p>1 against you on the basis of your age, your 2 race, your disability? 3 A. No.</p> <p>4 Q. In terms of, you identified three 5 people who you believe were treated more 6 favorably than you. Is there anyone else other 7 than the three that you identified, Perry, 8 Portolese and Scelsa, any other employees that 9 you believe were treated more favorably than 10 you? You told me Portolese, Scelsa and Perry. 11 A. I don't understand the question.</p> <p>12 Q. Yeah. So in your Charge of 13 Discrimination, you said that the company 14 retained employees that were less qualified and 15 younger than you and you identified those three 16 individuals when I asked you who they were. Is 17 there any other employee that you feel that 18 Brian treated better than you because of their 19 race? 20 MR. CHASE: Objection. You 21 can answer. 22 THE WITNESS: I could not 23 make a statement about how he treated 24 someone else unless I saw what he did 25 in front of me. I could not make a</p>

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<p style="text-align: right;">73</p> <p>1 statement like that.</p> <p>2 BY MS. BEGLEY:</p> <p>3 Q. And you never observed Brian doing</p> <p>4 anything that you believed was racist, correct?</p> <p>5 A. Once.</p> <p>6 Q. What was that?</p> <p>7 A. It's not, it's not really racist.</p> <p>8 He asked someone when they planned on retiring</p> <p>9 and how long would they plan on working.</p> <p>10 Q. And who --</p> <p>11 A. How long did they plan on working.</p> <p>12 Q. And when did he make that comment?</p> <p>13 A. He made the comment, it was around</p> <p>14 the time that the managers were discussing the</p> <p>15 people they wanted to RIF.</p> <p>16 Q. And were you there?</p> <p>17 A. I was sitting in the seat next to</p> <p>18 the person.</p> <p>19 Q. Were you aware of the fact that</p> <p>20 there was a RIF that was going to take place?</p> <p>21 A. Yes, they told us.</p> <p>22 Q. So you knew that individuals were</p> <p>23 going to be RIFed, correct?</p> <p>24 A. Yes.</p> <p>25 Q. And so who was present when he made</p>	<p style="text-align: right;">75</p> <p>1 Q. And was Hui an Engineer III?</p> <p>2 A. Yes.</p> <p>3 Q. And was Hui RIFed?</p> <p>4 A. No.</p> <p>5 Q. And so it related to his age, not</p> <p>6 his race, correct?</p> <p>7 A. I believe so.</p> <p>8 Q. You believe that it was with</p> <p>9 respect to his age; is that right?</p> <p>10 A. Yes.</p> <p>11 Q. Did you have a conversation with</p> <p>12 Hui about the comment?</p> <p>13 A. No.</p> <p>14 Q. But he never, Mr. Magee never made</p> <p>15 that comment to you, did he?</p> <p>16 A. No.</p> <p>17 Q. Never asked you about when you were</p> <p>18 going to retire, did he?</p> <p>19 A. No.</p> <p>20 Q. Did you report that comment to</p> <p>21 anyone at HR?</p> <p>22 A. No.</p> <p>23 Q. Did you say to Mr. Magee you</p> <p>24 thought it was not a proper question?</p> <p>25 A. No.</p>
<p style="text-align: right;">74</p> <p>1 that statement?</p> <p>2 A. The person he was talking to Joseph</p> <p>3 Hui.</p> <p>4 Q. I'm sorry, who --</p> <p>5 A. Joseph Hui.</p> <p>6 Q. Hui, H-E-W --</p> <p>7 A. H-U-E -- I'm sorry, H-U-I, I'm</p> <p>8 sorry and Steven Murphy was sitting there.</p> <p>9 Q. So he, just so I'm clear, Brian</p> <p>10 made a comment, it was you, Hardy --</p> <p>11 A. Hui.</p> <p>12 Q. Hui, was there another person and</p> <p>13 Murphy?</p> <p>14 A. And Murphy, just the three of us.</p> <p>15 Q. Just the three of you and Brian</p> <p>16 asked H-U-I, Hui when he was thinking of</p> <p>17 retiring, was that the comment?</p> <p>18 A. Yes.</p> <p>19 Q. And what did Hui say?</p> <p>20 A. He didn't say anything, he just</p> <p>21 looked at him.</p> <p>22 Q. And is Hui African-American?</p> <p>23 A. No, he's Asian.</p> <p>24 Q. Asian. And how old is Hui?</p> <p>25 A. He's older than I am.</p>	<p style="text-align: right;">76</p> <p>1 Q. Did you say anything to Mr. Hui</p> <p>2 about the question?</p> <p>3 A. Yes.</p> <p>4 Q. What did you say?</p> <p>5 A. I asked him how he felt about it.</p> <p>6 Q. And what did Mr. Hui say?</p> <p>7 A. He said it was just Brian being</p> <p>8 Brian.</p> <p>9 Q. And so from what you understood,</p> <p>10 Mr. Hui was not offended; is that correct?</p> <p>11 A. He was offended, he just wouldn't</p> <p>12 say. You could tell from his -- he turned beat</p> <p>13 red.</p> <p>14 Q. It was your perception he was</p> <p>15 offended; is that right?</p> <p>16 A. Yes.</p> <p>17 Q. But he didn't tell you that he was;</p> <p>18 is that right?</p> <p>19 A. Yes.</p> <p>20 Q. And when you asked him, he just</p> <p>21 said that was Brian being Brian?</p> <p>22 A. Yes.</p> <p>23 Q. And that was the complete</p> <p>24 conversation that you had with Mr. Hui; is that</p> <p>25 right?</p>

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<p style="text-align: right;">77</p> <p>1 A. Yes.</p> <p>2 Q. Any other comments that you heard</p> <p>3 Mr. Magee make during your employment that you</p> <p>4 felt were inappropriate?</p> <p>5 A. I can't recall right now.</p> <p>6 Q. Any statements that Mr. Mucillo</p> <p>7 ever made that you felt were inappropriate?</p> <p>8 A. I've never been within range of Mr.</p> <p>9 Mucillo.</p> <p>10 Q. And those are the two people that</p> <p>11 you believe had discriminated against you; is</p> <p>12 that right?</p> <p>13 A. Yes.</p> <p>14 MR. CHASE: Objection.</p> <p>15 MS. BEGLEY: Excuse me?</p> <p>16 MR. CHASE: You can answer.</p> <p>17 THE WITNESS: Yes.</p> <p>18 BY MS. BEGLEY:</p> <p>19 Q. And so I just want you to, are</p> <p>20 there any other facts that you believe support</p> <p>21 that you were discriminated against on the</p> <p>22 basis of your race, your age, your disability</p> <p>23 or the fact that you took FMLA leave that you</p> <p>24 haven't already told me about?</p> <p>25 A. I'm sorry, I'm thinking.</p>	<p style="text-align: right;">79</p> <p>1 responsibilities?</p> <p>2 A. Yes.</p> <p>3 Q. And in September of 2014; is that</p> <p>4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. And the work had initially been</p> <p>7 assigned to Mr. Murphy, correct?</p> <p>8 A. Yes.</p> <p>9 Q. And you felt that that was a</p> <p>10 positive statement about your performance,</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. And so my question to you is, are</p> <p>14 there any other facts that you believe support</p> <p>15 that you were discriminated against on the</p> <p>16 basis of your age, your race, your disability,</p> <p>17 or your request for FMLA leave that you haven't</p> <p>18 already shared with me?</p> <p>19 A. No.</p> <p>20 Q. So let's talk, you received</p> <p>21 performance evaluations during your course of</p> <p>22 employment and working for Mr. Magee, correct?</p> <p>23 A. Yes.</p> <p>24 Q. And between 2008 and I guess your</p> <p>25 last one was 2014, correct? Your last</p>
<p style="text-align: right;">78</p> <p>1 Q. Take your time. Take your time.</p> <p>2 You've already told me these facts are in your</p> <p>3 head like glue. So I want you to make sure</p> <p>4 you've told me everything.</p> <p>5 A. Oh, on an occasion, when work was</p> <p>6 not being done properly by Steve Murphy, he</p> <p>7 took Steve's work and he gave it, half of it, a</p> <p>8 portion of it to me and to someone else. And I</p> <p>9 felt that when he gave it to me, he knew that I</p> <p>10 was capable of getting the job done.</p> <p>11 Q. Okay.</p> <p>12 A. And it kind of surprised me that he</p> <p>13 knew I would get the work done, but in the same</p> <p>14 breath, he's saying that our services are no</p> <p>15 longer needed.</p> <p>16 Q. So tell me when you got the work</p> <p>17 that was initially assigned to Steve?</p> <p>18 A. It was in 2014, September of 2014.</p> <p>19 Q. And what was that work? What was</p> <p>20 the assignment?</p> <p>21 A. And it was an additional area to</p> <p>22 include, an additional area that was added to</p> <p>23 the areas of Philadelphia that I already was</p> <p>24 responsible for.</p> <p>25 Q. So he expanded your territory</p>	<p style="text-align: right;">80</p> <p>1 performance evaluation was 2014; is that right?</p> <p>2 A. Yes.</p> <p>3 Q. During that period, you received</p> <p>4 annual performance evaluations and I believe</p> <p>5 all of them were signed by Mr. Magee; is that</p> <p>6 right?</p> <p>7 A. The ones from 2008 to 2014?</p> <p>8 Q. Yes.</p> <p>9 A. I believe one was signed by</p> <p>10 Patricia McCoach.</p> <p>11 Q. So other than the one signed by</p> <p>12 McCoach, you were evaluated by Mr. Magee during</p> <p>13 that time period, right?</p> <p>14 A. Yes.</p> <p>15 Q. And you can correct me if I am</p> <p>16 wrong, but I believe every single evaluation</p> <p>17 between 2008 and 2014 that Mr. Magee prepared,</p> <p>18 he gave you an evaluation ranking or rating of</p> <p>19 "performing," which was the second highest,</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. All except one, right?</p> <p>23 A. Yes.</p> <p>24 Q. And your final evaluation from</p> <p>25 Mr. Magee, he gave you a performing, correct?</p>

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Pages 81 to 84

<p style="text-align: right;">81</p> <p>1 A. Yes.</p> <p>2 Q. And it's, I think it's my</p> <p>3 understanding and you can confirm what your</p> <p>4 understanding is, that Mr. Magee didn't give</p> <p>5 out leadings, which is the highest evaluation</p> <p>6 rating very often, right?</p> <p>7 A. He always gave out a leading.</p> <p>8 Q. He always gave out a leading, to</p> <p>9 whom?</p> <p>10 A. I know I gave one to Tom Hodge and</p> <p>11 want to Paul clause.</p> <p>12 Q. And one to Paul who?</p> <p>13 A. Klauss, K-L-A-U-S-S.</p> <p>14 Q. But "performing" was a good, solid</p> <p>15 evaluation, correct?</p> <p>16 A. Yes.</p> <p>17 Q. And you did receive one rate of</p> <p>18 "developing," which means performance did not</p> <p>19 meet objectives, requirements and expectations.</p> <p>20 Some or all were not met and improvement is</p> <p>21 needed. That's the description of developing,</p> <p>22 correct?</p> <p>23 A. I'm not sure.</p> <p>24 Q. So can I have a copy? So I guess</p> <p>25 this is Exhibit 2.</p>	<p style="text-align: right;">83</p> <p>1 -----</p> <p>2 MR. CHASE: Are you done</p> <p>3 reviewing?</p> <p>4 BY MS. BEGLEY:</p> <p>5 Q. Did you take a look, Ms. Walker?</p> <p>6 It's a chance to kind of quiet everything down</p> <p>7 for a minute. So we're looking at a</p> <p>8 performance evaluation for 2013 and if you look</p> <p>9 at the very last page of the document, it says</p> <p>10 employee and the signatures are electronic</p> <p>11 signatures and yours is dated 2/24/2014,</p> <p>12 correct?</p> <p>13 A. Yes.</p> <p>14 Q. And the manager is Brian Magee and</p> <p>15 the signature is of the same date, correct?</p> <p>16 A. Yes.</p> <p>17 Q. All right. So did you meet with</p> <p>18 Mr. Magee to discuss this evaluation?</p> <p>19 A. Yes.</p> <p>20 Q. And where did you meet?</p> <p>21 A. In his office.</p> <p>22 Q. This was the first time that</p> <p>23 Mr. Magee had given you a developing, correct?</p> <p>24 A. Yes.</p> <p>25 Q. And your prior performance</p>
<p style="text-align: right;">82</p> <p>1 MS. BROWN: Yes.</p> <p>2 -----</p> <p>3 (2013 Evaluation Bates</p> <p>4 Def_Walker_001 to 007 marked Walker</p> <p>5 Exhibit 2 for identification.)</p> <p>6 -----</p> <p>7 BY MS. BEGLEY:</p> <p>8 Q. So this is Exhibit 2 and this is</p> <p>9 your performance evaluation for year-end</p> <p>10 performance 2013.</p> <p>11 MR. CHASE: May I ask who</p> <p>12 that is?</p> <p>13 MS. BEGLEY: Yes, please.</p> <p>14 MS. NERO: Harvetta Nero,</p> <p>15 assistant general counsel for Verizon.</p> <p>16 MR. CHASE: Nice to meet</p> <p>17 you.</p> <p>18 MS. BEGLEY: And this is</p> <p>19 Ms. Walker.</p> <p>20 Take an opportunity</p> <p>21 Mrs. Walker to look at your performance</p> <p>22 evaluation for 2014.</p> <p>23 Off the record.</p> <p>24 -----</p> <p>25 (Discussion was held off the record.)</p>	<p style="text-align: right;">84</p> <p>1 evaluations under him had been at the</p> <p>2 performing level, correct?</p> <p>3 A. Yes.</p> <p>4 Q. So I'm sure you were not pleased to</p> <p>5 receive a developing; is that right?</p> <p>6 A. Yes.</p> <p>7 Q. What did Mr. Magee say to you about</p> <p>8 the rating?</p> <p>9 A. He said that stuff, items were</p> <p>10 getting, not getting done or missed and that</p> <p>11 things were getting out of hand.</p> <p>12 Q. And what did you say to him?</p> <p>13 A. I explained to him that due to</p> <p>14 being out, there was a lot I had to adjust to</p> <p>15 and we were meeting our demands and resolving</p> <p>16 our issues as quickly and positively as</p> <p>17 possible. That I had not received any</p> <p>18 complaints about anything being missed, dealing</p> <p>19 with the large major projects that we had going</p> <p>20 on at that time.</p> <p>21 Q. So look through this document with</p> <p>22 me, please. Because I want to make sure that I</p> <p>23 understand the document. It appears that and</p> <p>24 let's go, I'm going to count from the back.</p> <p>25 The third page from the back, which is Bates</p>

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<p style="text-align: right;">85</p> <p>1 labeled at the bottom defendant Walker 005. It</p> <p>2 appears that this is a mid, there's a midyear</p> <p>3 review on this page; is that correct?</p> <p>4 A. Yes.</p> <p>5 Q. And so your evaluation for the</p> <p>6 entire year Exhibit 2 contains both a midyear</p> <p>7 and an end-of-year evaluation, correct? So</p> <p>8 Section 3 is a midyear?</p> <p>9 A. Yes.</p> <p>10 Q. And Section 4 is an end of year.</p> <p>11 So let's look at Section 3 together, please.</p> <p>12 It says period, January 1 through June 30,</p> <p>13 correct, that's in the middle of the page?</p> <p>14 A. Uh-huh.</p> <p>15 Q. And it says Suzette, this is</p> <p>16 Manager Performance Summary, "Suzette was moved</p> <p>17 to conduit/highway in the first half of the</p> <p>18 year due to existing knowledge of conduit and</p> <p>19 the city permit process." That's what it says,</p> <p>20 right?</p> <p>21 A. Yes.</p> <p>22 Q. And that's true, right?</p> <p>23 A. Yes.</p> <p>24 Q. It then goes on to say "GPIS review</p> <p>25 has been a positive transition, but conduit</p>	<p style="text-align: right;">87</p> <p>1 your performance and the team's performance at</p> <p>2 this situation, correct?</p> <p>3 A. In Philadelphia and Delaware, yes.</p> <p>4 Q. And so that the team as a whole was</p> <p>5 succeeding in some areas and not doing so great</p> <p>6 in others, correct?</p> <p>7 A. Yes.</p> <p>8 Q. So as of the, in the middle of the</p> <p>9 year, you had an understanding that you were</p> <p>10 doing fine with the GPIS review, that has been</p> <p>11 a positive transition, but the conduit design</p> <p>12 has been hard to transition, right? That's</p> <p>13 what he said to you?</p> <p>14 A. Yes.</p> <p>15 Q. The end of the year, so and it's on</p> <p>16 Section 4, year-end review, which contains the</p> <p>17 January 1 through December 31, so the full year</p> <p>18 review. In the second paragraph, Magee said</p> <p>19 "Suzette made a transition at the end of 2012</p> <p>20 to the conduit department from a supervisory</p> <p>21 role, she remained with conduit all of 2013."</p> <p>22 Correct, that's what it says?</p> <p>23 A. Yes.</p> <p>24 Q. So when did you, do you know the</p> <p>25 date, did you start in December 2012, is that</p>
<p style="text-align: right;">86</p> <p>1 design has been hard to transition. Suzette</p> <p>2 has missed time due to an injury, which has</p> <p>3 made the transition difficult. The conduit</p> <p>4 area is still set up for the former conduit</p> <p>5 engineer and I have received complaints about</p> <p>6 the "conduit." Right, that's what it says, the</p> <p>7 conduit mailbox being full, right? That's what</p> <p>8 it says, right?</p> <p>9 A. Yes.</p> <p>10 Q. So here he says that GPIS review</p> <p>11 has been a positive transition, but he says</p> <p>12 conduit design has been hard to transition,</p> <p>13 right?</p> <p>14 A. Yes.</p> <p>15 Q. So at the bottom of the page, it</p> <p>16 goes on to say, "We are not where the</p> <p>17 conduit/highway team needs to be at this time."</p> <p>18 And the last sentence says, "The</p> <p>19 Philadelphia/Delaware team has a mixed results</p> <p>20 on the FOC metric, missing DS1 and OCN, making</p> <p>21 DS3 and ethernet --"</p> <p>22 A. Ethernet.</p> <p>23 Q. "-- ethernet. The</p> <p>24 Philadelphia/Delaware team is also missing the</p> <p>25 capital metric." So he's talking about both</p>	<p style="text-align: right;">88</p> <p>1 when you started --</p> <p>2 A. Yes.</p> <p>3 Q. -- in the conduit department? And</p> <p>4 you took leave at the end of April, so you had</p> <p>5 several months on the job before your leave,</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. And then you returned in July from</p> <p>9 your leave, correct?</p> <p>10 A. Yes.</p> <p>11 Q. All right. So you were only out a</p> <p>12 couple of months?</p> <p>13 A. Yes.</p> <p>14 Q. But you were employed, you know,</p> <p>15 you were employed the rest of the year and on</p> <p>16 the job the rest of the year, right?</p> <p>17 A. Yes.</p> <p>18 Q. So it says, Magee says "In the new</p> <p>19 job, Suzette adapted to the conflict management</p> <p>20 function that she was previously outsourced."</p> <p>21 And it goes on to say "The core function</p> <p>22 conduit design was not performed by Suzette to</p> <p>23 the level necessary to demonstrate ownership.</p> <p>24 This assignment was an opportunity for growth,</p> <p>25 but Suzette kept to a comfort zone and allowed</p>

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<p style="text-align: right;">89</p> <p>1 the contract engineer to run the conduit 2 department." That's what he said, right? 3 A. That's what he said. 4 Q. And he had made a reference at the 5 midyear that the conduit design had been hard 6 to transition, so again, he's referencing the 7 core function of conduit design that he wasn't 8 satisfied with your level of performance, 9 correct? 10 A. Yes. 11 Q. And you discussed this during your 12 meeting with him in February of 2014, correct? 13 A. Yes. 14 Q. And what did you tell him other 15 than what you've already testified to? 16 A. I told him that I was doing all the 17 work that I could to get the performance up to 18 par, considering that we were dealing with past 19 major projects that were designed by other 20 people. 21 Q. And what did he say? 22 A. He said, he said just do, get the 23 stuff done. 24 Q. And did you feel he was being 25 supportive?</p>	<p style="text-align: right;">91</p> <p>1 Q. And you felt that that was a good 2 and effective plan, correct? 3 A. Yes. 4 Q. And did it resolve some of the 5 problems? 6 A. Yes. 7 Q. And were you satisfied with that 8 action plan and its success? 9 A. Yes. 10 Q. And did Mr. Magee follow up with 11 you in any way to say that he was not 12 satisfied? 13 A. No. 14 Q. Did he ever follow up and tell you 15 he was satisfied? 16 A. No. 17 Q. But that was a single evaluation 18 that you received that was lower than 19 satisfactory, correct? 20 A. Yes. 21 Q. And did you feel that your 22 employment from that period forward was 23 positive? 24 A. Yes. 25 Q. After your performance evaluation</p>
<p style="text-align: right;">90</p> <p>1 A. No. 2 Q. And in what way was he not being 3 supportive? 4 A. He didn't understand the fact that 5 it was so much work that was behind, that was 6 left by prior, the prior occupant of the job 7 that it was impossible for us to do everything. 8 Q. Did you tell him that? 9 A. Yes. 10 Q. And so when you left the meeting, 11 did you have an action plan with him of what 12 you were going to do? 13 A. Yes. I did discuss an action plan. 14 That's why some items were contracted out to 15 alleviate some of that extra burden. 16 Q. So you told him what the problems 17 were when you met with him in person, correct? 18 A. Yes. 19 Q. And you and he agreed to an action 20 plan, right? 21 A. Yes. 22 Q. Which included assigning some of 23 the work to external contractors; is that 24 right? 25 A. Yes.</p>	<p style="text-align: right;">92</p> <p>1 on February 24, 2014, did you make any 2 complaint to HR about your evaluation? 3 A. No. 4 Q. Did you make any complaint to 5 anyone that you felt that your evaluation was 6 retaliation for taking FMLA leave? 7 A. No. 8 Q. Did you make a complaint to anyone 9 that you believed your 2013 performance 10 evaluation was based, was just based on 11 discrimination due to your disability? 12 A. No. 13 Q. Did you make a complaint to anyone 14 that your 2013 evaluation was in any way 15 unfair? 16 A. No, I didn't file a complaint. 17 Q. And in fact, you came up with an 18 action plan that you thought was successful 19 after your discussion with Mr. Magee, correct? 20 A. Yes. 21 Q. So you ended the discussion on a 22 good note; is that right? 23 A. Yes. 24 Q. In 2014, so during the year of 25 2014, you took on a new role; is that right?</p>

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<p style="text-align: right;">93</p> <p>1 A. Yes.</p> <p>2 Q. So you moved away from the</p> <p>3 conduit/highway which had been a pretty</p> <p>4 difficult assignment, right?</p> <p>5 A. Not really difficult.</p> <p>6 Q. Well, difficult because you said</p> <p>7 that there was all that backlog that hadn't</p> <p>8 been handled, right?</p> <p>9 A. It was different.</p> <p>10 Q. It was different, it was a lot of</p> <p>11 work, right?</p> <p>12 A. Yes.</p> <p>13 Q. And a lot of work and</p> <p>14 responsibilities due to the plate that you were</p> <p>15 served when you took on the responsibility and</p> <p>16 work that had not been performed in the past,</p> <p>17 is that your testimony?</p> <p>18 A. Say that again.</p> <p>19 Q. Yeah. So when you took on the</p> <p>20 conduit/highway, you believed that the person,</p> <p>21 your predecessor had not performed the</p> <p>22 responsibilities that they needed to; is that</p> <p>23 correct?</p> <p>24 A. They left a lot of open gaps.</p> <p>25 Q. And so you were assigned those open</p>	<p style="text-align: right;">95</p> <p>1 about what that job entailed?</p> <p>2 A. It entails handling high bandwidth,</p> <p>3 FIOS orders, cell site construction, copper</p> <p>4 network, existing copper network and dealing</p> <p>5 with large scale customers for the new</p> <p>6 building, high rise buildings with FTTP being</p> <p>7 the primary service. That's about it.</p> <p>8 Q. And so did you understand those job</p> <p>9 responsibilities would be associated with the</p> <p>10 Engineer Specialist III position when Mr. Magee</p> <p>11 came to you or did he describe them to you?</p> <p>12 A. He described them.</p> <p>13 Q. And what did you think about this</p> <p>14 opportunity?</p> <p>15 A. I think it was a wonderful</p> <p>16 opportunity.</p> <p>17 Q. So you were looking forward to</p> <p>18 making the transition to this new job?</p> <p>19 A. Yes.</p> <p>20 Q. And give me the date again in 2014?</p> <p>21 A. I believe it was April 15, '14,</p> <p>22 2014. It was April 2014.</p> <p>23 Q. April 2014?</p> <p>24 A. Yes.</p> <p>25 Q. And were you responsible for the</p>
<p style="text-align: right;">94</p> <p>1 gaps and that was responsibilities that</p> <p>2 ultimately had to be shared with outside</p> <p>3 contractors, correct?</p> <p>4 A. Yes.</p> <p>5 Q. So 2014, you are transitioned to a</p> <p>6 new position; is that correct?</p> <p>7 A. April 2014, yes.</p> <p>8 Q. April 2014. And what new position</p> <p>9 were you transitioned to?</p> <p>10 A. Engineer specialist.</p> <p>11 Q. And can you tell me what are the</p> <p>12 job duties, and is that an Engineer Specialist</p> <p>13 III or just an engineer specialist?</p> <p>14 A. Engineer Specialist III.</p> <p>15 Q. And how was that transition</p> <p>16 effectuated? How were you given that job</p> <p>17 responsibility?</p> <p>18 A. Mr. Magee came to me and said</p> <p>19 someone was leaving, there was a position open</p> <p>20 and he would like me to take it.</p> <p>21 Q. And what were the job duties of an</p> <p>22 Engineer III?</p> <p>23 A. The job duties are the design and</p> <p>24 maintenance of the telecommunications network.</p> <p>25 Q. Can you tell me a little bit more</p>	<p style="text-align: right;">96</p> <p>1 City of Philadelphia?</p> <p>2 A. Yes. A portion. A territory of</p> <p>3 the City of Philadelphia.</p> <p>4 Q. I'm going to give you a document.</p> <p>5 I would like you to tell me whether you've ever</p> <p>6 seen this document before. And this will be</p> <p>7 Plaintiff's Exhibit 3. And it's Bates labeled</p> <p>8 Defendant Walker 0024 and I don't know that the</p> <p>9 back document is Bates labeled. So just take a</p> <p>10 look Mrs. Walker and take your time, because I</p> <p>11 would like you to explain this document to me</p> <p>12 -----</p> <p>13</p> <p>14 (Corporate Technology & Network</p> <p>15 Functional Capabilities Document Bates</p> <p>16 Def_Walker_024 marked Walker Exhibit 3</p> <p>17 for identification.)</p> <p>18 -----</p> <p>19 THE WITNESS: It's just four</p> <p>20 pages?</p> <p>21 MS. BROWN: Yes.</p> <p>22 MS. BEGLEY: Yes, four</p> <p>23 pages.</p> <p>24 THE WITNESS: Thank you.</p> <p>25</p>

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<p style="text-align: right;">97</p> <p>1 BY MS. BEGLEY:</p> <p>2 Q. All right.</p> <p>3 MR. CHASE: Can I just ask a</p> <p>4 question real quick?</p> <p>5 MS. BEGLEY: Sure.</p> <p>6 MR. CHASE: The two</p> <p>7 documents that aren't Bates labeled,</p> <p>8 should I assume those would be 25 and</p> <p>9 26?</p> <p>10 MS. BROWN: They are</p> <p>11 produced. Yes, they are 26 and 27</p> <p>12 actually, yes.</p> <p>13 BY MS. BEGLEY:</p> <p>14 Q. So you've had time to take a look</p> <p>15 at the document, Mrs. Walker?</p> <p>16 A. Yes.</p> <p>17 Q. Can you tell me what this is? Have</p> <p>18 you seen this before?</p> <p>19 A. I've seen this once.</p> <p>20 Q. So I don't know if it's one</p> <p>21 document or two, but let's look at the first</p> <p>22 two pages. So it's the first page, which is</p> <p>23 Bates labeled 24. It says Corporate Technology</p> <p>24 and Network Functional Capabilities. So what</p> <p>25 is this, can you tell me?</p>	<p style="text-align: right;">99</p> <p>1 focused on what was?</p> <p>2 A. High bandwidth and, what is it</p> <p>3 called, just flew out of my head.</p> <p>4 Q. Take your time.</p> <p>5 A. We were doing a lot of high</p> <p>6 bandwidth work.</p> <p>7 Q. And can you tell me what that</p> <p>8 means? What does high bandwidth work mean?</p> <p>9 A. High bandwidth is technology that</p> <p>10 has a certain speed to allow a customer, for</p> <p>11 instance, we did a lot of work with the City of</p> <p>12 Philadelphia. They had several locations that</p> <p>13 needed to be interconnected, so that's the type</p> <p>14 of service we would sell to them. And high</p> <p>15 bandwidth had varying speeds that we used and</p> <p>16 depending on what existed at the customer prem</p> <p>17 at the time, whether we would reuse what was</p> <p>18 there or implement another type of technology</p> <p>19 to allow them better control of their</p> <p>20 facilities.</p> <p>21 Q. And how long had high bandwidth</p> <p>22 been an existing and important technology that</p> <p>23 Verizon was selling to customers?</p> <p>24 A. I couldn't tell you the time frame,</p> <p>25 but it's been around for quite sometime.</p>
<p style="text-align: right;">98</p> <p>1 A. This is actually what each grouping</p> <p>2 is responsible for.</p> <p>3 Q. So --</p> <p>4 A. And what they're being assessed at,</p> <p>5 the abilities to do these different items.</p> <p>6 Q. So in terms of the job duties that</p> <p>7 you were performing in 2013 and 2014, which</p> <p>8 category would you have been assessed under?</p> <p>9 A. Well, really some of -- all of</p> <p>10 these.</p> <p>11 Q. Go through and tell me, would you</p> <p>12 just tell me and we can identify them?</p> <p>13 A. The development and architecture,</p> <p>14 you had to be aware of that in order to do the</p> <p>15 job. You had to know what you were installing</p> <p>16 at people's -- at the customer's locations, how</p> <p>17 they worked. The capabilities of the</p> <p>18 equipment.</p> <p>19 Under knowledge of existing and</p> <p>20 emerging technologies, you had to know the</p> <p>21 technology you were using, how it affected the</p> <p>22 landscape of a customer's bill and how it</p> <p>23 impacted the technology you were using.</p> <p>24 Q. And in the 2013/2014 time period,</p> <p>25 what was the technology that you guys were</p>	<p style="text-align: right;">100</p> <p>1 Q. And what is your background and</p> <p>2 knowledge and experience in dealing with high</p> <p>3 bandwidth?</p> <p>4 A. I came into using high bandwidth</p> <p>5 when I originally started doing the orders.</p> <p>6 Q. So when was that?</p> <p>7 A. That was when I became an AT in</p> <p>8 1996.</p> <p>9 Q. And specifically what were you</p> <p>10 doing with respect to high bandwidth in 1996?</p> <p>11 A. In 1996, we were monitoring the</p> <p>12 systems. There was light span and different</p> <p>13 types of technology that were used then. And</p> <p>14 we had to build certain things into the</p> <p>15 database, the corporate database to allow</p> <p>16 customers' facilities to work.</p> <p>17 Q. What other -- so that was 1996?</p> <p>18 A. Yes. That was my first touch.</p> <p>19 Q. That was your first touch with high</p> <p>20 bandwidth. What other experience between 1996</p> <p>21 and 2015 were you dealing with high bandwidth?</p> <p>22 A. And then I was taken away from it</p> <p>23 and brought back to it in 2014.</p> <p>24 Q. So your first touch was in 1996 and</p> <p>25 then in between '96 and 2014, you were taken</p>

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<p style="text-align: right;">101</p> <p>1 away from high bandwidth and in 2014, was that</p> <p>2 April 15, 2015, when you became an Engineering</p> <p>3 Specialist III that you returned to high</p> <p>4 bandwidth?</p> <p>5 A. Yes. I'm sorry, 1996, it was for</p> <p>6 like four years, from 1996 to like 2000</p> <p>7 something, I'm sorry.</p> <p>8 Q. That's fine. And that was exactly</p> <p>9 what you had described to me in terms of what</p> <p>10 your job responsibilities were in that time</p> <p>11 period with respect to high bandwidth, correct?</p> <p>12 A. Yes.</p> <p>13 Q. And so from 2000 to 2014, you</p> <p>14 weren't connected with high bandwidth, correct?</p> <p>15 A. Yes.</p> <p>16 Q. You weren't doing high bandwidth</p> <p>17 work?</p> <p>18 A. Correct.</p> <p>19 Q. And in April 2015, when Magee came</p> <p>20 to you and offered you the Engineer Specialist</p> <p>21 III position, you returned to dealing with high</p> <p>22 bandwidth, correct?</p> <p>23 A. Yes.</p> <p>24 Q. And that was from your perspective,</p> <p>25 an exciting opportunity, right?</p>	<p style="text-align: right;">103</p> <p>1 the Engineer Specialist III position was</p> <p>2 dealing with high bandwidth, could you put a</p> <p>3 ballpark percentage?</p> <p>4 A. I would say 45 percent.</p> <p>5 Q. And did you need to work with</p> <p>6 others to be able to provide that service?</p> <p>7 Were there contractors or engineers or were</p> <p>8 there other individuals that you worked with to</p> <p>9 provide that service to customers?</p> <p>10 A. Yes.</p> <p>11 Q. And who was that?</p> <p>12 A. I had to work with the outside</p> <p>13 forces, other engineers in other departments as</p> <p>14 far as ordering supplies and getting things</p> <p>15 done and planners and several different groups</p> <p>16 you had to work with.</p> <p>17 Q. So the outside engineers, who were</p> <p>18 they?</p> <p>19 A. The foremen.</p> <p>20 Q. I'm sorry?</p> <p>21 A. The foremen, outside foremen.</p> <p>22 Q. Outside foremen?</p> <p>23 A. Yes.</p> <p>24 Q. Did you have a particular person</p> <p>25 assigned to you?</p>
<p style="text-align: right;">102</p> <p>1 A. Yes.</p> <p>2 Q. And with respect to the Engineer</p> <p>3 III position, what work were you doing that</p> <p>4 related to high bandwidth?</p> <p>5 A. We had to do SRs, which a customer</p> <p>6 would put in a request for services. We would</p> <p>7 receive the SR, we would investigate, see what</p> <p>8 the customer needed as far as capability. We</p> <p>9 would go out and do a field survey and then we</p> <p>10 would come back and design the job.</p> <p>11 Q. And so how much of that particular</p> <p>12 job, the Engineer Specialist III position were</p> <p>13 you dealing with high bandwidth?</p> <p>14 A. Oh, a large portion.</p> <p>15 Q. So could you put a --</p> <p>16 A. Because that was the premier.</p> <p>17 Q. That was the premier product?</p> <p>18 A. Yes.</p> <p>19 Q. And that was kind of the cutting</p> <p>20 edge, right?</p> <p>21 A. Yes.</p> <p>22 Q. And the future of services Verizon</p> <p>23 was providing; is that right?</p> <p>24 A. Yes.</p> <p>25 Q. So when you say a large portion of</p>	<p style="text-align: right;">104</p> <p>1 A. No.</p> <p>2 Q. And then what about when you said</p> <p>3 the other engineers, were they the only</p> <p>4 engineers?</p> <p>5 A. Like planners.</p> <p>6 Q. Planners?</p> <p>7 A. Engineers.</p> <p>8 Q. And any particular people you were</p> <p>9 working with in April --</p> <p>10 A. MaryAnn Bruno.</p> <p>11 Q. Who is it?</p> <p>12 A. MaryAnn Bruno was my planner.</p> <p>13 Q. Anyone else that you worked with in</p> <p>14 providing high bandwidth to customers?</p> <p>15 A. We also had to work with a group</p> <p>16 that they forwarded the orders to us. When we</p> <p>17 finished with the order, we had to send the</p> <p>18 order back to them to move it along. I believe</p> <p>19 that was Mr. Zielinski's group.</p> <p>20 Q. And were your relationships with</p> <p>21 all these people positive?</p> <p>22 A. Yes.</p> <p>23 Q. So I had asked you when we looked</p> <p>24 into this box of existing technologies, so you</p> <p>25 came up with high bandwidth and you said there</p>

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<p style="text-align: right;">105</p> <p>1 was another, but you couldn't remember what it 2 was. 3 A. And we did FIOS. 4 Q. Was the second one you were 5 thinking of? 6 A. Yes, I'm sorry. 7 Q. That's fine. So FIOS, what were 8 your responsibilities with respect to providing 9 FIOS to customers? 10 A. That position was twofold. 11 Q. Tell me. 12 A. Because the larger jobs were 13 initiated by another group, but they were 14 initiated within my territory. So you had to 15 sometimes monitor or perform duties in 16 conjunction with what was going on. And then 17 you had the day-to-day new buildings that were 18 designed on a smaller scale that needed to be 19 addressed. 20 Q. Did you have to engage in any kind 21 of training to take on this Engineer Specialist 22 III position? 23 A. Yes. 24 Q. And what was that training? 25 A. I was trained with the high</p>	<p style="text-align: right;">107</p> <p>1 Q. Was there anyone else that had a 2 specialized background or focus on HPW in the 3 Engineer III Specialist group? 4 A. Paul Klauss and Steve Murphy. 5 Q. Did you ever work with any of them 6 in HBW? 7 A. Yes. 8 Q. What did you do? 9 A. Steve Murphy and I would go out on 10 surveys and survey his jobs and my jobs at the 11 same time. 12 Q. And he had a specialized knowledge 13 in HBW from your perspective? 14 A. In certain realms. 15 Q. And how about with Paul, did you 16 work with Paul directly? 17 A. I would talk to him on the phone 18 about different things. 19 Q. And was he helpful? 20 A. Yes. 21 Q. And knowledgeable? 22 A. Yes. 23 Q. What about FIOS, what was your 24 background and experience -- and let me 25 rephrase. How big a percentage of your job was</p>
<p style="text-align: right;">106</p> <p>1 bandwidth, I was trained with Thomas Hodge. 2 Q. How do you spell that last name? 3 A. H-O-D-G-E. 4 Q. And what did Hodge, like what was 5 Hodge's job? 6 A. He was a Specialist III. 7 Q. And how much time did you and Hodge 8 spend together with him teaching you how to 9 perform the job? 10 A. A little less than a month. 11 Q. Less than a month? 12 A. Yes. 13 Q. Was it daily? 14 A. Basically. 15 Q. Did he come on the job with you and 16 show you how to do the work? 17 A. We went on a couple of surveys, 18 yes. 19 Q. And was he helpful? 20 A. Very. 21 Q. Was he knowledgeable? 22 A. Very. 23 Q. And did he have a special focus on 24 HBW that he was able to teach you? 25 A. Yes.</p>	<p style="text-align: right;">108</p> <p>1 dealing with FIOS? 2 A. I would say 20 percent. 3 Q. 20 percent. And what was your 4 background and experience in selling FIOS and 5 dealing with FIOS? 6 A. FIOS, I saw from a supervisory 7 position initially. 8 Q. When was that? 9 A. That was prior to 2000 -- that was 10 in 2010. I believe. When they first initiated 11 FIOS in some of my areas. 12 Q. And from a supervisory perspective, 13 what did you do with FIOS? 14 A. The network that would use FIOS, 15 going in and making sure that jobs were posted 16 properly in the database and that any errors 17 that existed were resolved. 18 Q. So what year was that, I'm sorry? 19 A. I think that was 2010. 20 Q. 2010. And that's when you were 21 section manager, right? 22 A. Yes. 23 Q. Is that right? 24 A. Team leader supervisor? 25 Q. Yeah, I have -- you have a couple</p>

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<p style="text-align: right;">109</p> <p>1 of jobs in 2010. So you have supervisor</p> <p>2 network engineering and then section manager</p> <p>3 network engineering, both in 2010.</p> <p>4 A. Yes. That was really all the same</p> <p>5 job.</p> <p>6 Q. And so what other background and</p> <p>7 experience did you have in dealing with FIOS?</p> <p>8 A. Numerous classes we had to attend,</p> <p>9 training, as far as the FIOS concept.</p> <p>10 Q. Was there any special additional</p> <p>11 information that you had to learn as an</p> <p>12 Engineer III to manage and supply support on</p> <p>13 the FIOS end?</p> <p>14 A. Yes. We went to weekly meetings</p> <p>15 concerning updates and changes in procedure.</p> <p>16 Q. And who conducted those weekly</p> <p>17 meetings?</p> <p>18 A. They were done by Lori Andrews and</p> <p>19 team.</p> <p>20 Q. And --</p> <p>21 A. And her team.</p> <p>22 Q. So who is Lori Andrews?</p> <p>23 A. She's I believe an Engineer IV.</p> <p>24 Q. Were there any individuals in the</p> <p>25 Engineer Specialist III group that had a</p>	<p style="text-align: right;">111</p> <p>1 A. No.</p> <p>2 Q. Were there any aspects of supplying</p> <p>3 this service that you felt challenging or</p> <p>4 difficult?</p> <p>5 A. Dealing with large scale buildings</p> <p>6 that someone else was designing.</p> <p>7 Q. And tell me what the issues were?</p> <p>8 A. Their design plan was usually</p> <p>9 different than what we would have suggested.</p> <p>10 And there were a lot of complaints from</p> <p>11 building owners.</p> <p>12 Q. When you had these issues, did you</p> <p>13 bring them to anyone's attention or did you</p> <p>14 engage anyone to help you out?</p> <p>15 A. I discussed the problems with</p> <p>16 Mr. Magee.</p> <p>17 Q. And what did he say?</p> <p>18 A. And we would come up with a plan</p> <p>19 and resolve the issue and forward it to the</p> <p>20 team that handled the actual FIOS, the</p> <p>21 selection of the contractors that performed</p> <p>22 FIOS FTTP and resolve it in that manner.</p> <p>23 Q. And they were outside individuals,</p> <p>24 correct?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">110</p> <p>1 particular focus or expertise in FIOS?</p> <p>2 A. Paul Klauss.</p> <p>3 Q. Paul Klauss. Anyone else that you</p> <p>4 know of?</p> <p>5 A. I'm trying to think of his last</p> <p>6 name. Brian Henry. He was not in the group.</p> <p>7 He was in an actual FTTP group.</p> <p>8 Q. What does FTTP mean?</p> <p>9 A. Fiber to the premise.</p> <p>10 Q. So fiber to the premise, what did</p> <p>11 that have to do with FIOS?</p> <p>12 A. That is FIOS.</p> <p>13 Q. That is FIOS?</p> <p>14 A. Yes.</p> <p>15 Q. And so why did we use the two</p> <p>16 names? Why do you use FTTP and FIOS?</p> <p>17 A. That's just terminology.</p> <p>18 Q. And again, tell me, what percentage</p> <p>19 of the Engineer Specialist III was FIOS for</p> <p>20 you?</p> <p>21 A. About 20, 25 percent.</p> <p>22 Q. And was there any area in this FIOS</p> <p>23 FTTP realm that you felt you needed additional</p> <p>24 training or assistance in order to perform your</p> <p>25 job?</p>	<p style="text-align: right;">112</p> <p>1 Q. And again, with the outside</p> <p>2 individuals, did you, was there anyone in</p> <p>3 particular that you worked with, any outside</p> <p>4 contractor that you worked with in particular?</p> <p>5 A. No.</p> <p>6 Q. So it was just whoever was</p> <p>7 available?</p> <p>8 A. It was whoever she selected.</p> <p>9 Q. When you say she, who?</p> <p>10 A. Lori Andrews.</p> <p>11 Q. And you had a good relationship</p> <p>12 with Lori, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Let's look at your evaluation for</p> <p>15 2014.</p> <p>16 MR. CHASE: Before you get</p> <p>17 to that, could we take a five-minute</p> <p>18 break?</p> <p>19 MS. BEGLEY: Sure. Sure.</p> <p>20 -----</p> <p>21 (A recess was taken at this time.)</p> <p>22 -----</p> <p>23 BY MS. BEGLEY:</p> <p>24 Q. Let's go back to the document</p> <p>25 that's in front of you, Exhibit 3, because you</p>

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<p style="text-align: right;">113</p> <p>1 were identifying some of the areas that you</p> <p>2 were responsible for performing jobs in 2013</p> <p>3 and 2014. Is there anything else? You looked</p> <p>4 at development and architecture. You looked at</p> <p>5 knowledge of existing and emerging</p> <p>6 technologies. Anything else on this document</p> <p>7 that you want to share with me that you were</p> <p>8 responsible for knowing, and utilizing and</p> <p>9 performing your job during this period of time?</p> <p>10 A. The job really entailed touching on</p> <p>11 all of these contents in some way, shape or</p> <p>12 form.</p> <p>13 Q. So are there any categories where</p> <p>14 you focused more in your final position as an</p> <p>15 Engineer III than others?</p> <p>16 A. The last one, implementation and</p> <p>17 asset management.</p> <p>18 Q. Go through that with me, please,</p> <p>19 and tell me what your responsibilities were in</p> <p>20 that category?</p> <p>21 A. Configuration and installation,</p> <p>22 end-to-end testing. The outside people did</p> <p>23 that to make sure everything worked properly.</p> <p>24 Facilities/data center managed that, we didn't</p> <p>25 have anything to do with it, but the facilities</p>	<p style="text-align: right;">115</p> <p>1 security of our network.</p> <p>2 Q. There wasn't a checklist, it was</p> <p>3 just something that in terms of learning how to</p> <p>4 do the job you understood all of the elements</p> <p>5 and criteria to perform the job, correct?</p> <p>6 A. I didn't have a checklist in</p> <p>7 writing, no.</p> <p>8 Q. But you knew which each of the</p> <p>9 responsibilities were --</p> <p>10 A. Yes.</p> <p>11 Q. -- in terms of performing the job.</p> <p>12 So then let's just look at the, look at the</p> <p>13 next page, please, on Exhibit 3. And it says</p> <p>14 Functional Capability Expectations by Job</p> <p>15 Family. Can you tell me what this is? And</p> <p>16 it's broken down into job family, technology,</p> <p>17 network engineer and ops. So you were the</p> <p>18 network engineer and ops, correct?</p> <p>19 A. Yes.</p> <p>20 Q. And the Xes in the box are</p> <p>21 knowledge of existing and emerging</p> <p>22 technologies. And you said basically the</p> <p>23 knowledge of existing and emerging technologies</p> <p>24 was HBW and FIOS or FTTP, correct?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">114</p> <p>1 itself.</p> <p>2 Under network/system operations</p> <p>3 and security, at times, we had to resolve</p> <p>4 outage problems.</p> <p>5 Standards, procedures, tools and</p> <p>6 compliance processes, we had a large part in</p> <p>7 that, because when something changed, you had</p> <p>8 to create new standards and procedures.</p> <p>9 Q. Anything else?</p> <p>10 A. When placing certain materials, you</p> <p>11 had to keep in mind the security and integrity</p> <p>12 of your customer's premise as far as access to</p> <p>13 different things and other companies having</p> <p>14 access to your equipment. You had to keep that</p> <p>15 in mind as well.</p> <p>16 Q. As an Engineer III, did you have a</p> <p>17 plan for each of your projects where all these</p> <p>18 issues were identified?</p> <p>19 A. I think whenever you looked at a</p> <p>20 job, you just automatically ticked off from A</p> <p>21 to Z the importance of following procedure,</p> <p>22 making sure you understand what the customer</p> <p>23 wants, making sure you can provide the customer</p> <p>24 with what they need in a timely manner and a</p> <p>25 specific location while keeping in mind the</p>	<p style="text-align: right;">116</p> <p>1 Q. Any others, are there any other</p> <p>2 existing or emerging technologies that were</p> <p>3 critical in performing the Engineering III</p> <p>4 Specialist position?</p> <p>5 A. Product development and innovation,</p> <p>6 because as times go on, new equipment comes</p> <p>7 out, so you decide to do things with new</p> <p>8 equipment and also you keep in mind the -- with</p> <p>9 the work force diminishing who is going to do</p> <p>10 the services for the customer. So that does</p> <p>11 come into play.</p> <p>12 Q. And so when you say the work force</p> <p>13 diminishing, what does that mean?</p> <p>14 A. The outside work force was</p> <p>15 diminishing.</p> <p>16 Q. And why was that?</p> <p>17 A. They were downsizing outside</p> <p>18 people.</p> <p>19 Q. So your external resources were now</p> <p>20 limited as the company was limiting its use of</p> <p>21 outside, what were they, outside engineers,</p> <p>22 outside contractors?</p> <p>23 A. No, they were outside technicians.</p> <p>24 Q. Outside technicians?</p> <p>25 A. Yes.</p>

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<p style="text-align: right;">117</p> <p>1 Q. So as the work force diminished as 2 a network engineer, you had more 3 responsibilities; is that right? 4 A. Yes. You had to design things, 5 more use, better guidance and knowledge of your 6 equipment. 7 Q. So you had, the position was 8 evolving in terms of responsibilities you had 9 as an Engineering III Specialist, right? 10 A. Constantly. Constantly. 11 Q. So let me just get it straight. 12 HBW, FIOS, FTTP, those were the knowledge of 13 the existing technologies, correct? 14 A. Yes. 15 Q. That you had to be up to speed on. 16 And then you were also committed to focusing on 17 knowledge and understanding of product 18 development and innovation as this was an 19 evolving field, right? 20 A. Yes. 21 Q. Copper, where did copper fit into 22 this whole world? 23 A. Copper would be existing -- 24 Q. Existing? 25 A. -- technology. Because we were no</p>	<p style="text-align: right;">119</p> <p>1 technology, correct? 2 A. No. 3 Q. And copper was really a thing of 4 the past; is that right? 5 A. Technically. 6 Q. And when you say technically, what 7 does that mean? 8 A. It still had to be maintained. 9 Q. And from your perspective though, 10 you said 50 percent of your job, what do you 11 mean was dealing with copper? 12 A. 50 percent was dealing with as the 13 copper network failed, trying to get those 14 individuals into the FTTP grouping. 15 Q. So when you were alerted of a 16 particular job that had failing, damaged 17 copper, your goal was to replace it with FTTP, 18 correct? 19 A. Yes, if possible. 20 Q. If possible? 21 A. If possible. 22 Q. And how often was it possible? 23 A. It became more and more possible as 24 time went on. 25 Q. And why is that?</p>
<p style="text-align: right;">118</p> <p>1 longer placing new copper, if possible. I mean 2 in some aspects, you still had to repair 3 damaged copper and maintain it in areas where 4 FTTP was not available. So that was like in 5 the areas, territory that I handled, that was 6 like 50 percent of my job. 7 Q. 50 percent of your job was what? 8 A. Maintaining the copper network in 9 the areas that did not have FTTP. 10 Q. But that wasn't, maintaining copper 11 wasn't an emerging technology -- 12 A. No. 13 Q. -- is that right? 14 A. No. 15 Q. And that was something that -- 16 A. Was going to disappear. 17 Q. Was going to disappear and probably 18 pretty quickly disappeared, right, with FTTP? 19 A. Yes. 20 Q. But during the period of time you 21 were there, there was still some responsibility 22 to repair damaged copper and replace damaged 23 copper? 24 A. Yes. 25 Q. But that wasn't a future</p>	<p style="text-align: right;">120</p> <p>1 A. Because the infrastructure was 2 being built. 3 Q. And is this during 2014 that it was 4 being built? 5 A. In that area that I was dealing 6 with, yes. 7 Q. And do you have an understanding of 8 what the plan was in terms of total 9 infrastructure being built for FTTP? 10 A. Well, it kept getting pushed back, 11 so I don't really know what the actual plan 12 was. We met weekly to discuss what we could 13 do, how far we could go and everything depends 14 on budget. 15 Q. But the goal was to move away from 16 copper and move into FTTP? 17 A. Yes. 18 Q. And build an infrastructure to 19 accommodate that, right? 20 A. Yes. 21 Q. So let's go to the next page of 22 Exhibit 3, please, which is page 3. And up at 23 the top it says Job Family: Network 24 Engineering and Operations and under 25 Engineering III Specialist, it says it's a Band</p>

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<p style="text-align: right;">121</p> <p>1 7T; is that correct?</p> <p>2 A. Yes.</p> <p>3 Q. From 2008 to 2015, can you tell me</p> <p>4 the different bands you were in?</p> <p>5 A. I couldn't tell you, I really don't</p> <p>6 remember.</p> <p>7 Q. Were you promoted by Brian Magee at</p> <p>8 any time?</p> <p>9 A. No.</p> <p>10 Q. No. So in 2010, you weren't</p> <p>11 promoted by Brian Magee?</p> <p>12 A. No.</p> <p>13 Q. All right. So let me just look</p> <p>14 through your jobs quickly, just so I'm clear.</p> <p>15 A. Oh yes. Yes, I went from a</p> <p>16 supervisor to an engineer.</p> <p>17 Q. Okay.</p> <p>18 A. I'm sorry.</p> <p>19 Q. That's okay. So you started out</p> <p>20 with Magee in 2008 as a supervisor network</p> <p>21 engineer and then in 2010, you went to a</p> <p>22 section manager networking engineer, was that a</p> <p>23 promotion?</p> <p>24 A. No.</p> <p>25 Q. So then you went to a section</p>	<p style="text-align: right;">123</p> <p>1 A. It could be.</p> <p>2 Q. So let's look at Engineer III and</p> <p>3 I'm having a hard time reading this, because it</p> <p>4 is so small. I need new glasses. So it says</p> <p>5 provides operational or technical support in</p> <p>6 the development, analysis and maintenance of</p> <p>7 systems, software, processes, products, or</p> <p>8 equipment. Generally follows</p> <p>9 established/documented approaches to issues and</p> <p>10 problems.</p> <p>11 A. That's four.</p> <p>12 MS. BROWN: Do you want me</p> <p>13 to read three?</p> <p>14 MS. BEGLEY: You are</p> <p>15 kidding. Delete all of that. Yeah, I</p> <p>16 need someone else to read it. I can't.</p> <p>17 So I'm going to have my colleague</p> <p>18 Valerie read three, because it's too</p> <p>19 small for me to read.</p> <p>20 MS. BROWN: Provides</p> <p>21 resolution to diverse range of complex</p> <p>22 problems. Data analysis requires</p> <p>23 selection of methods and techniques for</p> <p>24 obtaining information and reaching</p> <p>25 solutions. And independent evaluation</p>
<p style="text-align: right;">122</p> <p>1 manager network engineer to a specialist</p> <p>2 network engineer?</p> <p>3 A. That was a promotion.</p> <p>4 Q. That was a promotion. So that was</p> <p>5 in 2012?</p> <p>6 A. Okay.</p> <p>7 Q. And do you know whether there was a</p> <p>8 band increase along with that?</p> <p>9 A. I'm not sure.</p> <p>10 Q. So let's look at this page 3 of</p> <p>11 Exhibit 3 where it says Engineering III</p> <p>12 Specialist. And up at the top it says Job</p> <p>13 Family: Network Engineering and Operations,</p> <p>14 responsible for design, implementation and</p> <p>15 operation of advanced network infrastructure</p> <p>16 and systems. So the advanced network</p> <p>17 infrastructures, what does that mean? Do you</p> <p>18 know?</p> <p>19 A. I don't know what they mean by</p> <p>20 that.</p> <p>21 Q. Well, what was the infrastructure?</p> <p>22 A. The infrastructure was the copper</p> <p>23 network and the fiber network.</p> <p>24 Q. And the advanced network, would</p> <p>25 that be the fiber network?</p>	<p style="text-align: right;">124</p> <p>1 of multiple interrelated factors.</p> <p>2 BY MS. BEGLEY:</p> <p>3 Q. So that's under work complexity,</p> <p>4 would you agree that that was the</p> <p>5 responsibility of the Engineer III specialist?</p> <p>6 A. Yes.</p> <p>7 Q. And then under Enterprise</p> <p>8 Leadership capabilities, it says leadership</p> <p>9 differ by band, so there's no statement under</p> <p>10 there. And then if we move down to functional</p> <p>11 capabilities of the Engineer III, I'm going to</p> <p>12 read from the correct column this time,</p> <p>13 generally has learning proficiency in all of</p> <p>14 the relevant knowledge and skills.</p> <p>15 And under education, it says BS</p> <p>16 preferred or equivalent, or equivalent work</p> <p>17 experience. Do you have a bachelor's degree?</p> <p>18 A. Yes.</p> <p>19 Q. And when did you receive your</p> <p>20 bachelor's degree?</p> <p>21 A. In '96 I believe.</p> <p>22 Q. When was it?</p> <p>23 A. I believe it was '96.</p> <p>24 Q. 1996. You graduated from college</p> <p>25 with a BS?</p>

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<p style="text-align: right;">125</p> <p>1 A. Yes.</p> <p>2 Q. And what college was that?</p> <p>3 A. Temple.</p> <p>4 Q. And what was your, what was your</p> <p>5 degree?</p> <p>6 A. Finance.</p> <p>7 Q. Finance. Any advanced degree?</p> <p>8 A. A master's degree in business</p> <p>9 technology.</p> <p>10 Q. And when did you receive that?</p> <p>11 A. 2006.</p> <p>12 Q. You were employed by Verizon at the</p> <p>13 time?</p> <p>14 A. Pardon me?</p> <p>15 Q. You were employed by Verizon at the</p> <p>16 time you received your master's degree?</p> <p>17 A. Yes.</p> <p>18 Q. Did Verizon in any way pay or</p> <p>19 reimburse you for your tuition?</p> <p>20 A. Yes.</p> <p>21 Q. So how many years did it take you</p> <p>22 to get your master's?</p> <p>23 A. Two.</p> <p>24 Q. Did you go to night school?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">127</p> <p>1 BY MS. BEGLEY:</p> <p>2 Q. So let's look at the second page of</p> <p>3 Exhibit 4. And toward the bottom of the page,</p> <p>4 at the second to last paragraph, it says</p> <p>5 Requestnet to maintain effectiveness. What's</p> <p>6 Requestnet?</p> <p>7 A. Requestnet is where you receive</p> <p>8 your SRs for service requests.</p> <p>9 Q. Your service requests?</p> <p>10 A. Yes, it comes from a database.</p> <p>11 Q. And so the first bullet says adjust</p> <p>12 to the FTTP workflow process between</p> <p>13 departments to meet the HHs past expectations.</p> <p>14 What does that mean? Do you know?</p> <p>15 A. Oh, FTTP came through a system and</p> <p>16 from department to department, HHs are</p> <p>17 households.</p> <p>18 Q. Households?</p> <p>19 A. Households. And you were given</p> <p>20 certain expectations of how many households you</p> <p>21 needed to pass.</p> <p>22 Q. Is it residences or is it something</p> <p>23 else?</p> <p>24 A. It could be residences. It could</p> <p>25 be businesses. It depends.</p>
<p style="text-align: right;">126</p> <p>1 Q. And did they reimburse you for all</p> <p>2 your tuition?</p> <p>3 A. They paid.</p> <p>4 Q. They paid for it?</p> <p>5 A. Yes.</p> <p>6 Q. And then under experience, Valerie,</p> <p>7 I'm going back to you, because I can't see that</p> <p>8 number.</p> <p>9 MS. BROWN: Generally three</p> <p>10 plus years in related discipline.</p> <p>11 BY MS. BEGLEY:</p> <p>12 Q. So is that your understanding of</p> <p>13 the individual contributors from a technical</p> <p>14 perspective for that job?</p> <p>15 A. This is the first time I'm seeing</p> <p>16 this paper.</p> <p>17 Q. All right. So let's now go to your</p> <p>18 2014 performance evaluation. So this is</p> <p>19 Exhibit 4.</p> <p>20 - - - - -</p> <p>21 (2014 Performance Evaluation Bates</p> <p>22 Def_Walker_008 to 017 marked Walker</p> <p>23 Exhibit 4 for identification.)</p> <p>24 - - - - -</p> <p>25</p>	<p style="text-align: right;">128</p> <p>1 Q. And two down it says resolve</p> <p>2 FTTP-based problems using the proper processes</p> <p>3 to alleviate missing HHs. What does that mean?</p> <p>4 A. That means that in the database you</p> <p>5 had to update certain information in the system</p> <p>6 telling how many households a particular work</p> <p>7 product would pass in order for it to count.</p> <p>8 Those household numbers had to be included so</p> <p>9 that you can keep a current record of how many</p> <p>10 households that work really encompassed.</p> <p>11 Q. If you can page back to the</p> <p>12 document that is defendant Walker 012 at the</p> <p>13 bottom of the page, like three or four pages</p> <p>14 back.</p> <p>15 A. What are we in --</p> <p>16 Q. On the same document, like go back</p> <p>17 and at the bottom of the page it says 012,</p> <p>18 that's the page I'm looking for. And looking</p> <p>19 for the section that says Improve the Customer</p> <p>20 Experience. So under Improve the Customer</p> <p>21 Experience, it says improve network</p> <p>22 availability, description and measures, what</p> <p>23 does that mean, do you know?</p> <p>24 A. Where do you see that?</p> <p>25 Q. I'm going to point to where I'm</p>

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<p style="text-align: right;">129</p> <p>1 looking at. Here's that page, under</p> <p>2 description and measures, it says improve</p> <p>3 network availability. This is part of your</p> <p>4 job. Do you see it or no?</p> <p>5 A. I'm see it. I'm trying to think</p> <p>6 what it's about.</p> <p>7 Q. Yeah. Take your time.</p> <p>8 A. I'm sorry.</p> <p>9 Q. That's okay. Take your time.</p> <p>10 A. I'm not sure what he meant by that.</p> <p>11 Q. What would be the, what was the</p> <p>12 network available to your customers in the 2014</p> <p>13 time frame? What network are we talking about?</p> <p>14 A. It depended on the portion of the</p> <p>15 territory you were in. And what type of,</p> <p>16 whether it was a business or a regular</p> <p>17 residential customer. A lot of the businesses</p> <p>18 were on networks that would have picked up high</p> <p>19 bandwidth. A lot of the regular customers,</p> <p>20 some in certain areas were able to pick up</p> <p>21 FTTP. But then there was still that large</p> <p>22 number that were not in range of either one, so</p> <p>23 you would have to build to that particular</p> <p>24 customer using one or the other items.</p> <p>25 Depending on what was more conducive to the end</p>	<p style="text-align: right;">131</p> <p>1 Q. -- the copper?</p> <p>2 A. Yes.</p> <p>3 Q. But even in that situation it was</p> <p>4 as the infrastructure grew, it was replacing</p> <p>5 the copper?</p> <p>6 A. We were trying to get away from it.</p> <p>7 Q. So you were moving away from</p> <p>8 copper, right?</p> <p>9 A. Yes.</p> <p>10 Q. Down at the bottom of the page, it</p> <p>11 says employee accomplishments/status. Do you</p> <p>12 see that section?</p> <p>13 A. Yes.</p> <p>14 Q. And it says PA One Call</p> <p>15 contractors -- contractor calls for locates,</p> <p>16 markups and dig ups. Direct, and it looks like</p> <p>17 design prints to the proper engineers to</p> <p>18 expedite the completion of new developments in</p> <p>19 PA. Respond to design requests. And then</p> <p>20 there's processed and it has a bunch of numbers</p> <p>21 under it. Does this reference your performance</p> <p>22 specifically, do you know?</p> <p>23 A. Yes.</p> <p>24 Q. It does?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">130</p> <p>1 result the customer was looking for.</p> <p>2 Q. When you say one or the other item,</p> <p>3 would it be --</p> <p>4 A. The fiber or the high bandwidth.</p> <p>5 Q. But those are the only two networks</p> <p>6 that you were looking to provide to customers;</p> <p>7 is that right?</p> <p>8 A. Unless it was a cell site.</p> <p>9 Q. And what does that mean?</p> <p>10 A. A cell site.</p> <p>11 Q. And what does that mean?</p> <p>12 A. Where AT&T or some other customer</p> <p>13 was building a cell site and we had to provide</p> <p>14 service to that particular cell site.</p> <p>15 Q. And what kind of service would that</p> <p>16 be?</p> <p>17 A. That's like a high bandwidth type</p> <p>18 thing.</p> <p>19 Q. So it's all pretty much, everything</p> <p>20 that you were doing in terms of customer</p> <p>21 servicing was FTTP and high bandwidth. Is that</p> <p>22 right?</p> <p>23 A. In most cases, yes.</p> <p>24 Q. Unless it was repairing --</p> <p>25 A. Right, the copper.</p>	<p style="text-align: right;">132</p> <p>1 Q. So can you tell me what all this</p> <p>2 means?</p> <p>3 A. This talks about design requests</p> <p>4 could be from City of Philadelphia, PennDOT,</p> <p>5 different utilities. As far as invoicing, that</p> <p>6 could be payment to contractors and vendors for</p> <p>7 certain items. PARS are requests that are put</p> <p>8 in for issuing work out to vendors.</p> <p>9 Q. Okay.</p> <p>10 A. Designs from contractors are, in</p> <p>11 some cases, they could be the major jobs that I</p> <p>12 was speaking of from FTTP. They could be the</p> <p>13 movement that's going on now over on Vine</p> <p>14 Street, the moving the bridges. It could be</p> <p>15 something of that type. The GPIS request --</p> <p>16 Q. What is that, what is a GPIS</p> <p>17 request?</p> <p>18 A. GPIS is something, the state, the</p> <p>19 City of Philadelphia has a system whenever you</p> <p>20 do work in the City of Philadelphia, you have</p> <p>21 to go into the system called GPIS. You have to</p> <p>22 insert what you're trying to do, where you're</p> <p>23 trying to do it with all the particulars,</p> <p>24 footage, how far you're going. And the system</p> <p>25 sends out e-mail notices to all the utilities</p>

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<p style="text-align: right;">133</p> <p>1 within the area of your work.</p> <p>2 Q. So the numbers that are here, the</p> <p>3 metrics that are here, it says processed and</p> <p>4 then there are a bunch of numbers?</p> <p>5 A. Yes.</p> <p>6 Q. Can you tell me what those numbers</p> <p>7 mean?</p> <p>8 A. Those are probably my numbers.</p> <p>9 Q. And so can you tell me whether</p> <p>10 those are good numbers, like were they --</p> <p>11 A. Well, they have to be good numbers.</p> <p>12 Q. And why is that?</p> <p>13 A. Because these are all the items</p> <p>14 that I received.</p> <p>15 Q. I can't hear you.</p> <p>16 A. When I put the numbers in for him,</p> <p>17 these are all the items that I worked on during</p> <p>18 my period of time.</p> <p>19 Q. So you believe those are positive</p> <p>20 metrics regarding your employment; is that</p> <p>21 right?</p> <p>22 A. Yes.</p> <p>23 Q. Go onto the next page and it says</p> <p>24 30 3rd party request?</p> <p>25 A. 30 3rd party requests are when</p>	<p style="text-align: right;">135</p> <p>1 A. Yes.</p> <p>2 Q. So all of those statements provide</p> <p>3 assistance with new processes and procedures?</p> <p>4 A. He put in the last item.</p> <p>5 Q. Which one did he put in?</p> <p>6 A. Process TLS and VON orders within</p> <p>7 the eight-day constraints.</p> <p>8 Q. What does that mean?</p> <p>9 A. That means I process the order</p> <p>10 within a shorter time that we were given to do</p> <p>11 the work.</p> <p>12 Q. So he's asking you to do, to</p> <p>13 process TLS and VON orders in a shorter period</p> <p>14 of time --</p> <p>15 A. Yes.</p> <p>16 Q. -- which was eight-day time</p> <p>17 constraints, right?</p> <p>18 A. Yes.</p> <p>19 Q. And what about the section right</p> <p>20 above that, provide information on problems</p> <p>21 from FIOS customers to the proper individuals</p> <p>22 to provide customer satisfaction. Was that</p> <p>23 something you put in there?</p> <p>24 A. Yes.</p> <p>25 Q. Let's go to the next page. And</p>
<p style="text-align: right;">134</p> <p>1 companies would initiate a process of placing</p> <p>2 their utilities on Verizon poles.</p> <p>3 Q. Okay.</p> <p>4 A. So we had to address those issues.</p> <p>5 So we had 30 actual requests.</p> <p>6 Q. And under that there's again a</p> <p>7 number of metrics, 15 PA One Call requests with</p> <p>8 conduit prints, 50 service orders problems,</p> <p>9 four PennDOT milling jobs.</p> <p>10 A. The 15PA One Call requests are</p> <p>11 requests that were put in by Verizon for</p> <p>12 conduit prints.</p> <p>13 Q. And was this your specific</p> <p>14 performance?</p> <p>15 A. Yes.</p> <p>16 Q. Let's go down to Simplify Products,</p> <p>17 Policies and Processes. And employee</p> <p>18 accomplishments/status. Do you see that</p> <p>19 section?</p> <p>20 A. Yes.</p> <p>21 Q. And it says tell me, is this</p> <p>22 information that you provided or that Mr. Magee</p> <p>23 provided?</p> <p>24 A. I provided.</p> <p>25 Q. You provided it?</p>	<p style="text-align: right;">136</p> <p>1 this is under Fuel our Culture, Description and</p> <p>2 Measures on Employee Development, job related</p> <p>3 training. And it says complete two training</p> <p>4 courses. So are these the training courses?</p> <p>5 There's one listed.</p> <p>6 A. Yes.</p> <p>7 Q. Did you complete that training</p> <p>8 course?</p> <p>9 A. Yes.</p> <p>10 Q. Yes?</p> <p>11 A. Yes.</p> <p>12 Q. Was there another that you missed?</p> <p>13 A. There was another there.</p> <p>14 Q. Did you complete another training</p> <p>15 course?</p> <p>16 A. That is really two.</p> <p>17 Q. Okay.</p> <p>18 A. It should be underneath.</p> <p>19 Q. That's fine. All right. So then</p> <p>20 it says Recognition, Employee</p> <p>21 Accomplishments/Status, ESSM for session. What</p> <p>22 does this mean? Are these just training</p> <p>23 programs?</p> <p>24 A. Those are the training courses.</p> <p>25 Q. That you participated in?</p>

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<p style="text-align: right;">137</p> <p>1 A. Yes. Training courses and major 2 products I had to oversee. 3 Q. So let's go to the next page, which 4 is at the bottom of the page defendant Walker 5 015 and again Section 3 is the midyear review, 6 January 1 through June 30. And in the midyear, 7 Manager Performance Summary, Magee states 8 "Suzette, your numbers look good considering 9 your time on the turf. Take ownership of your 10 turf and learn as much as you can during the 11 remainder of this year on HBW." So he's 12 telling you to learn more during the remainder 13 of the year on high bandwidth? 14 A. Yes. 15 Q. And did you agree that that was an 16 area where you needed and wanted to learn more? 17 A. I wanted to learn more. 18 Q. And he was directing you to do so 19 during your review? 20 A. Yes. 21 Q. It then goes along to say "If you 22 can get your FAC verification under eight, you 23 will be making a big contribution to the team. 24 What does that mean? What's an FAC 25 verification?"</p>	<p style="text-align: right;">139</p> <p>1 A. I can't remember at this time. 2 Q. You had zero, why did you have 3 zero? 4 A. I can't remember. 5 Q. Do you know what, I mean do you 6 know what it's referring to and why you only 7 had zero? 8 A. Yeah, I can't remember what it is. 9 Q. What about NWC HH, the group had 10 223 on the average, you had 166? 11 A. Basically I really wasn't involved 12 in a lot of FTTP jobs at that point of the 13 year. I didn't start really doing FTTP work 14 until later in the year. 15 Q. When was it that you really started 16 doing FTTP work? 17 A. After I would say like July, 18 August, around there that I really started to 19 step up, because the area that I received from 20 Mr. Murphy was actually involved in FTTP work. 21 And that's when it started -- no, that was 22 September. 23 Q. September? 24 A. Yes. That's when I really started 25 to have fiber to the prem jobs.</p>
<p style="text-align: right;">138</p> <p>1 A. Facilities verifications. 2 Q. Can you tell me what it means 3 though, getting it under 8? 4 A. Facilities verifications is part of 5 an SR process where you actually contact the 6 customer, do the survey, come back and design 7 the print and issue it all in under eight days. 8 Q. Under eight days? 9 A. Yes. 10 Q. And where were you at this point, 11 do you know, in midyear? 12 A. No. 13 Q. So let's look above. It says, 14 district averages versus your averages at 15 midyear, print issued, so the district was 136 16 and yours was 111. What does that mean? 17 A. I issued 111 prints. 18 Q. And the district average was 136, 19 right? 20 A. Yes. 21 Q. Hours issued, and the district was 22 6503 and yours was 3137. What does that mean? 23 A. I have no idea about those hours. 24 Q. Then it says number of ODN HH and 25 it says 97 versus zero. What is an ODN?</p>	<p style="text-align: right;">140</p> <p>1 Q. So September of 2014 when the work 2 was transitioned from Murphy, that's when you 3 really started doing FTTP work -- 4 A. A lot of FTTP work, yes. 5 Q. -- is that right? And did you have 6 to do any training to be able to assume that 7 responsibility for FTTP in September? 8 A. I had to train as I did it. 9 Because there was no time to actually sit for 10 weeks at a time. The work had to be done. 11 Q. So were you looking forward to 12 taking on this new responsibility of FTTP work 13 in September of 2014? 14 A. Yes, yes. 15 Q. And when Magee brought this to you, 16 did you tell him you were looking forward to 17 taking on this responsibility? 18 A. Yes. 19 Q. And did he tell you you're going to 20 have to learn it as you go? 21 A. Yes. 22 Q. And did you say, well, I need 23 training of some sort? What was the discussion 24 about how you would get the training you needed 25 to do the job?</p>

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<p style="text-align: right;">141</p> <p>1 A. The discussion was I knew the 2 people who, the actual group who handled FTTP. 3 And I had people within my group, Paul Klauss 4 was there and he stepped up and he said 5 whatever you need and that's how we did it. 6 Q. And so from September 2014 on, you 7 had a significant focus that you hadn't 8 previously on FTTP, correct? 9 A. Right. 10 Q. And your team, the team helped you 11 learn how to do it? 12 A. We worked as a team. 13 Q. And you felt that that was 14 successful, the team was supporting you? 15 A. Yes. And not including the 16 meetings we had every week and training 17 sessions online. 18 Q. So you had actual hands-on training 19 from Paul Klauss and others; is that right? 20 A. From the FTTP group, yes. 21 Q. From September on? 22 A. Yes. 23 Q. So let's go down, it says average 24 of FAC verification, 18.2 versus 10.3. Right? 25 A. Yes.</p>	<p style="text-align: right;">143</p> <p>1 summary says your average of FAC verification 2 8.4 versus 12.7 team's average, right? 3 A. Uh-huh. 4 Q. And then your number of SRs 25 5 versus 57 team's average, right? 6 A. Uh-huh. 7 MS. NERO: You have to give 8 a verbal response. 9 BY MS. BEGLEY: 10 Q. And Magee's statement in your 11 performance evaluation, has Suzette 12 continued -- 13 A. Oh, I'm sorry. 14 Q. What did I -- 15 MS. NERO: She's saying 16 uh-huh and you're not telling her yes 17 for the record. 18 MS. BEGLEY: Oh, thank you 19 for being co-counsel. 20 MS. NERO: Yeah, I try. 21 BY MS. BEGLEY: 22 Q. Suzette continued to grow into the 23 turf role in 2014. These are Magee's comments. 24 She took the HBW focus and moved her facility 25 verification number to metric. Suzette</p>
<p style="text-align: right;">142</p> <p>1 Q. So you were a ten, right? 2 A. Yes. 3 Q. SR numbers, 25 versus six. What 4 does that mean? 5 A. Oh, the average person got 25 and I 6 only got six. 7 Q. And what is an SR? 8 A. SR is the request that comes in for 9 facilities, be it DS1, DS2, high bandwidth. 10 That's what the SR is. It's the customer 11 request for facilities. 12 Q. So how would those come in? 13 A. They he come in over the database. 14 Q. So you -- 15 A. As a customer requests service, the 16 SR comes in, you go in and look and see what's 17 in your area and you pick it. 18 Q. Did he expect you to take on more 19 than 6 SRs? 20 A. It's based on your area. Your 21 territory. 22 Q. That's fine. Let's go to the 23 final, I believe it's the almost final page, 24 second to last page and this is Section 4, 25 year-end review. And the manager performance</p>	<p style="text-align: right;">144</p> <p>1 utilizes and manages the SOW contractors well, 2 but would benefit from completing more of the 3 HBW surveys herself. Also greater focus on 4 the end product of the contractors' product is 5 necessary. So that was the complete statement 6 of Mr. Magee, correct, for your performance 7 between January 1, 2014 and end of year 8 December 31, correct? 9 A. Yes. 10 Q. So let's break it down a little 11 bit. So his first statement is that you 12 continued to grow into the turf role in 2014 13 and that was a new role, right? 14 A. Yes. 15 Q. And again, it was April 2014 when 16 you were assigned that job? 17 A. Yes. 18 Q. So you're only in it a portion of 19 the year, correct? 20 A. Yes. 21 Q. He goes on to say she took the HBW 22 focus and moved her facility verification 23 number to metric, right? 24 He also says that you utilize and 25 manage the SOW contractors well, but would</p>

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<p style="text-align: right;">145</p> <p>1 benefit from completing more of the HBW surveys 2 yourself. What does that mean? 3 A. Statement of work contractors went 4 out and did a lot of the surveys and -- 5 Q. Were these the guys that were being 6 eliminated? 7 A. No, no, these were actual -- 8 Q. Were they Verizon? 9 A. -- contractors, yes. 10 Q. But he wanted you to complete more 11 of the HBW surveys yourself, what did -- 12 A. I did a lot of the surveys. I 13 explained to him that a lot of in my area, a 14 lot of the surveys were blanket surveys where 15 it was the City of Philadelphia, you had to do 16 eight different locations. So when I had jobs 17 like that, I did all of those myself. If they 18 were like random jumping from one area of 19 Philadelphia down to the other area, I couldn't 20 cover all those at one time and still maintain 21 the FTTP process and the SRs, it was impossible 22 and he told us, we were project managers. We 23 were supposed to manage the work the best that 24 we could and get it done. 25 Q. So did you have that discussion</p>	<p style="text-align: right;">147</p> <p>1 Q. And then the last sentence says and 2 "Also greater focus on the end product of the 3 contractors' product is necessary." What is 4 that? 5 A. That's the large scale jobs I was 6 discussing earlier. And taking the time to 7 review all of their work and the problems that 8 existed when they provided the end product. 9 Q. What's the end product, what is 10 that? 11 A. The end product is a large scale 12 design that shows the actual building of a 13 network inside the customer premise of a large 14 scale building making sure that the design is 15 proper for the installation of the service as 16 far as accessibility and the equipment that's 17 being placed. 18 Q. And this contractor, is this still 19 a SOW contractor or is it another contractor? 20 A. No, it's another contractor. 21 Q. Are these the contractors that are 22 diminishing and being used less? 23 A. No. 24 Q. So these are still contractors? 25 A. Yes.</p>
<p style="text-align: right;">146</p> <p>1 with him when you met with him? 2 A. Yes. 3 Q. And did he accept your explanation? 4 A. He says then something, I have to 5 put something on the back burner. And I 6 explained to him to meet the dates with the 7 volume of work that I had, I had to do what was 8 best for customers to get the job done and out, 9 issued and processed immediately. 10 Q. And what did he say? 11 A. He said okay. 12 Q. Did you think your meeting with him 13 was positive and you met with him February 25, 14 2015, to discuss the 2014 evaluation, was it a 15 positive meeting? 16 A. Yes. He understood what I was 17 trying to say. 18 Q. And did you feel that you were 19 communicating effectively with him? 20 A. Yes. 21 Q. And that he was listening? 22 A. Yes, he was listening. 23 Q. And did you feel it was a positive 24 meeting? 25 A. Yes.</p>	<p style="text-align: right;">148</p> <p>1 Q. What kind of contractors are these? 2 A. These are contractors that Lori 3 Andrews hires to do these large scale jobs. 4 Q. So your overall rating for 2014 was 5 performing, correct? 6 A. Yes. 7 Q. And you were happy with that 8 evaluation, correct? 9 A. Yes. 10 Q. Anything else in your meeting with 11 Mr. Magee regarding your 2014 evaluation, any 12 other comments that he made, any comments that 13 you made to him about your evaluation, about 14 your job performance? 15 A. No. 16 Q. About your future? 17 A. No, just discussed how we should 18 continue to make things better. 19 Q. Can you tell me about the meeting 20 that you had with Mr. Magee on April 23, 2015, 21 where he notified you that your position was 22 being eliminated? 23 A. What do you want to know? 24 Q. So how was that meeting set up? 25 Did someone call you and tell you?</p>

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<p style="text-align: right;">149</p> <p>1 A. No.</p> <p>2 Q. So how did the meeting occur?</p> <p>3 A. I walked into the office and he</p> <p>4 walked, he walked toward me and he said I need</p> <p>5 to speak to you. We went into the conference</p> <p>6 room and he explained what was going on. He</p> <p>7 said the company was going in a different</p> <p>8 direction. He gave me all the package that he</p> <p>9 was supposed to give me and he asked me did I</p> <p>10 want to stay and I left.</p> <p>11 Q. So that was it, that was your only</p> <p>12 discussion?</p> <p>13 A. That was it.</p> <p>14 Q. How long did it take?</p> <p>15 A. About ten minutes.</p> <p>16 Q. You didn't ask him any questions?</p> <p>17 A. I asked him how did they come to</p> <p>18 the decision.</p> <p>19 Q. And what did he say?</p> <p>20 A. He didn't say anything.</p> <p>21 Q. Did you, so you left and did you go</p> <p>22 home or what did you do?</p> <p>23 A. I walked around.</p> <p>24 Q. Did you talk with anyone else?</p> <p>25 A. No.</p>	<p style="text-align: right;">151</p> <p>1 A. Yes, he did.</p> <p>2 Q. Did he give you anyone's name in HR</p> <p>3 that you should contact to talk about job</p> <p>4 opportunities?</p> <p>5 A. It was all on the paperwork.</p> <p>6 Q. It was all in the paperwork?</p> <p>7 A. Yes.</p> <p>8 Q. So you took the package. Can I</p> <p>9 have a copy of the package, please and this</p> <p>10 will be Plaintiff's Exhibit 5.</p> <p>11 -----</p> <p>12 (Packet Bates P1 to P18 marked</p> <p>13 Walker Exhibit 5 for identification.)</p> <p>14 -----</p> <p>15 BY MS. BEGLEY:</p> <p>16 Q. So take a look, Mrs. Walker, at</p> <p>17 Plaintiff's Exhibit 5, which is the packet that</p> <p>18 was given to you by Mr. Magee on April 23,</p> <p>19 2015, in connection with the reduction in force</p> <p>20 and confirm that this is the package that you</p> <p>21 did receive.</p> <p>22 A. Yes.</p> <p>23 Q. And so when he handed you the</p> <p>24 package and did you look at the package at all</p> <p>25 when he sat and met with you on that date?</p>
<p style="text-align: right;">150</p> <p>1 Q. Did you alert anyone of the fact</p> <p>2 that you were impacted by the reduction in</p> <p>3 force?</p> <p>4 A. Not until the next day.</p> <p>5 Q. So then did you come back to work</p> <p>6 the next day or two?</p> <p>7 A. No.</p> <p>8 Q. And did he tell you that you could</p> <p>9 stop working immediately?</p> <p>10 A. Yes.</p> <p>11 Q. Did he tell you, you had to stop</p> <p>12 working immediately?</p> <p>13 A. He said that I didn't have to do</p> <p>14 anything else.</p> <p>15 Q. And you understood that the</p> <p>16 effective date for your termination was May 22?</p> <p>17 A. Yes.</p> <p>18 Q. About a month later, right?</p> <p>19 A. Yes.</p> <p>20 Q. And that you would be paid through</p> <p>21 that period of time, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Did he tell you that you have the</p> <p>24 opportunity to look for other jobs at the</p> <p>25 company?</p>	<p style="text-align: right;">152</p> <p>1 A. Yes.</p> <p>2 Q. You did look at it?</p> <p>3 A. Yes.</p> <p>4 Q. And did you ask him any questions</p> <p>5 about it?</p> <p>6 A. No.</p> <p>7 Q. Did he say if you have questions,</p> <p>8 you can come back to me, did he --</p> <p>9 A. No.</p> <p>10 Q. Did he say he was sorry to notify</p> <p>11 you of the fact that your job was terminated?</p> <p>12 A. Yes.</p> <p>13 Q. And what did you say to him?</p> <p>14 A. I didn't say anything.</p> <p>15 Q. I mean did he tell you that he had</p> <p>16 enjoyed working with you?</p> <p>17 A. Yes.</p> <p>18 Q. Did you cry?</p> <p>19 A. No.</p> <p>20 Q. Was he visibly upset?</p> <p>21 A. Yes.</p> <p>22 Q. And you believed that was true, he</p> <p>23 was upset, right?</p> <p>24 A. Yes.</p> <p>25 Q. When you paged through the package,</p>

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<p style="text-align: right;">153</p> <p>1 did you see there was information about career 2 transition services that would have been 3 provided to you? 4 A. Yes. 5 Q. Did you ever contact Lee Hecht 6 Harrison? Did you ever contact Lee Hecht 7 Harrison? 8 A. No. 9 Q. There was information about pension 10 and how to obtain a pension estimate. Do you 11 have a pension from Verizon? 12 A. Yes. 13 Q. And what's the amount of your 14 pension, do you know? 15 A. I couldn't tell you. 16 Q. Were you retirement eligible at the 17 time that you received notice of the reduction 18 in force? You were employed for how many 19 years, 30 years? 20 A. Thirty-six, 37 years. 21 Q. So you were retirement eligible? 22 A. Yes. 23 Q. Full retirement? 24 A. Yes. 25 Q. Have you tapped into your</p>	<p style="text-align: right;">155</p> <p>1 Q. You said you have a child who is 2 34, 36? 3 A. Yes, 34. 4 Q. Thirty-four. Is it a son or a 5 daughter? 6 A. Son. 7 Q. Do you have grandchildren? 8 A. Yes. 9 Q. And where do they all live? 10 A. With their father. 11 Q. With their father? 12 A. Father and their mother. 13 Q. Oh, your grandchildren, so how old 14 are your grandchildren? 15 A. My granddaughter is eight. 16 Q. And do they live close to you? 17 A. No. 18 Q. Are you close to your son? 19 A. I don't live close to him, no. 20 Q. No, are you close to him in terms 21 of a relationship? 22 A. Yes. 23 Q. Are where does he live? 24 A. He lives in Manayunk. 25 Q. In Manayunk. And you're in the</p>
<p style="text-align: right;">154</p> <p>1 retirement at all? 2 A. Just my, some of my investments. 3 Q. Does your retirement include any 4 medical? 5 A. Yes. 6 Q. It does? 7 A. Yes, you pay for it though. 8 Q. And are you utilizing that? 9 A. Yes. 10 Q. So you're receiving your medical 11 through Verizon? 12 A. Yes. 13 Q. And what do you have to pay for it? 14 What is it per month? 15 A. Like \$350 a month, 314, something 16 like that. 17 Q. So your husband's state retirement 18 from the State of Pennsylvania, does he have 19 all of his medical coverage? 20 A. No. 21 Q. So is he with that 300, are you 22 covering your husband? 23 A. Yes. 24 Q. Do you have any other dependents? 25 A. No.</p>	<p style="text-align: right;">156</p> <p>1 City of Philadelphia? 2 A. Yes. 3 Q. That's pretty close. 4 A. Kind of. 5 Q. How often do you see your 6 granddaughter? 7 A. Every two weeks. 8 Q. Every two weeks. Do you ever do 9 any babysitting? 10 A. Sometimes. 11 Q. So you if you page back to 12 attachment A, it indicates that had you signed 13 the release agreement, you would have been 14 entitled to \$69,271 in severance, correct? 15 A. What page is that? 16 Q. It's page 12. 17 A. Yes. 18 Q. And you chose not to sign the 19 release agreement, correct? 20 A. Correct. I'm sorry, correct. 21 Q. What efforts did you make 22 internally to obtain a job and what specific 23 jobs did you apply for at Verizon once you were 24 notified of the fact that you were being 25 impacted by the reduction in force?</p>

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<p style="text-align: right;">157</p> <p>1 A. There were only two jobs in the</p> <p>2 system in Pennsylvania. No, one job in</p> <p>3 Pennsylvania and one job was in New Jersey. It</p> <p>4 was, it was an administrative, Human Resources</p> <p>5 administrator in Piscataway and the only --</p> <p>6 there were no -- no, that's wrong. There were</p> <p>7 no jobs in Pennsylvania.</p> <p>8 Q. So there were no jobs posted in</p> <p>9 Pennsylvania between April 23, 2015, and</p> <p>10 May 22, 2015; is that right?</p> <p>11 A. Right. None that I had the</p> <p>12 specific qualifications for.</p> <p>13 Q. So did you apply for any jobs?</p> <p>14 A. Yes, I did.</p> <p>15 Q. What jobs did you apply for?</p> <p>16 A. That was the one in Piscataway for</p> <p>17 I believe it was an office, what was it</p> <p>18 called --</p> <p>19 Q. The HR administrative job?</p> <p>20 A. Yes.</p> <p>21 Q. Once your termination date was</p> <p>22 effective, the May 22nd date, were you still</p> <p>23 permitted to apply for jobs at Verizon?</p> <p>24 A. Not through the Verizon website.</p> <p>25 Q. But you could do it otherwise?</p>	<p style="text-align: right;">159</p> <p>1 A. Kevin Johnson.</p> <p>2 Q. Kevin Johnson. And who else?</p> <p>3 A. I can't tell you. I don't know</p> <p>4 about the other two.</p> <p>5 Q. And how do you know Kevin Johnson</p> <p>6 had a lawsuit against the company?</p> <p>7 A. He told me.</p> <p>8 Q. And when did you last talk with</p> <p>9 Kevin Johnson?</p> <p>10 A. September of, this is 2016?</p> <p>11 Q. September 2015?</p> <p>12 A. Wait a minute. Wait a minute. I</p> <p>13 believe I spoke to him in March of 2016.</p> <p>14 Q. 2016?</p> <p>15 A. Yes.</p> <p>16 Q. And can you tell me the nature of</p> <p>17 the discussion with him in 2016?</p> <p>18 A. He just asked me, it was just basic</p> <p>19 friendly conversation about what we were doing.</p> <p>20 Q. And did you tell him you had a</p> <p>21 lawsuit?</p> <p>22 A. No.</p> <p>23 Q. But he told you he had a lawsuit?</p> <p>24 A. Yes.</p> <p>25 Q. And what did he say he was suing</p>
<p style="text-align: right;">158</p> <p>1 A. Through Indeed.</p> <p>2 Q. Through what?</p> <p>3 A. Through Indeed.com.</p> <p>4 Q. And did you do that? Did you do</p> <p>5 that?</p> <p>6 A. When jobs came up and I looked for</p> <p>7 them, yes, but there was nothing available.</p> <p>8 Q. So from the date of your</p> <p>9 termination, notice of termination, April 23,</p> <p>10 2015, until today, how many jobs at Verizon</p> <p>11 have you applied for?</p> <p>12 A. None.</p> <p>13 Q. Have you had conversation, you</p> <p>14 identified three other African-American</p> <p>15 employees that were impacted by the reduction</p> <p>16 in force and their employment was terminated</p> <p>17 and you say you know of five, correct?</p> <p>18 A. Yes.</p> <p>19 Q. Have you discussed your case with</p> <p>20 any of those individuals?</p> <p>21 A. No.</p> <p>22 Q. Have any of those individuals filed</p> <p>23 lawsuits against the company?</p> <p>24 A. I believe so.</p> <p>25 Q. Who?</p>	<p style="text-align: right;">160</p> <p>1 for?</p> <p>2 A. He didn't say.</p> <p>3 Q. He didn't say?</p> <p>4 A. No.</p> <p>5 Q. Did he say he was suing for race</p> <p>6 discrimination?</p> <p>7 A. He didn't say.</p> <p>8 Q. Do you know who he's represented</p> <p>9 by?</p> <p>10 A. No.</p> <p>11 Q. Since. All right. So I asked you</p> <p>12 did you discuss the fact that you were, your</p> <p>13 employment was terminated on April 23rd and I</p> <p>14 said did you discuss it with anyone on that</p> <p>15 date and other than your discussion with Magee,</p> <p>16 you had no discussions with anyone on that date</p> <p>17 that you were terminated, correct?</p> <p>18 A. No one at Verizon.</p> <p>19 Q. So who outside of Verizon, just</p> <p>20 your husband?</p> <p>21 A. My husband and my son.</p> <p>22 Q. And you son. And the next day, did</p> <p>23 you have conversations with anyone regarding</p> <p>24 your termination?</p> <p>25 A. No. I didn't talk to anyone within</p>

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<p style="text-align: right;">161</p> <p>1 Verizon the next day.</p> <p>2 Q. So from April 23, 2015, to the</p> <p>3 present, who have you talked with about either</p> <p>4 your employment at Verizon or the termination</p> <p>5 of your employment?</p> <p>6 A. Just my lawyer.</p> <p>7 Q. From April 23, 2015, to the</p> <p>8 present, who have you discussed your lawsuit</p> <p>9 with?</p> <p>10 A. No one.</p> <p>11 Q. So you haven't talked to any former</p> <p>12 Verizon employee, current or former Verizon</p> <p>13 employee about your lawsuit?</p> <p>14 A. No.</p> <p>15 Q. Are you aware of whether you're --</p> <p>16 whether the law firm that is representing you</p> <p>17 has reached out to any current or former</p> <p>18 employee of Verizon to discuss your lawsuit?</p> <p>19 A. No, I don't.</p> <p>20 Q. And you can't tell me that because</p> <p>21 you don't know or for some other reason?</p> <p>22 A. I don't know.</p> <p>23 Q. Have you, is it your intention to</p> <p>24 call any former or present Verizon employees as</p> <p>25 witnesses in your lawsuit?</p>	<p style="text-align: right;">163</p> <p>1 Q. And you identified the positive</p> <p>2 treatment that you received as well, correct?</p> <p>3 A. Yes.</p> <p>4 Q. And so when you say the people that</p> <p>5 you worked with would know about that, are</p> <p>6 those the Engineer IIIs?</p> <p>7 A. Yes.</p> <p>8 Q. Yes?</p> <p>9 A. Anyone that worked at 900 Race,</p> <p>10 anyone who worked at 900 Race on that floor.</p> <p>11 Q. So it's the Engineer IIIs, who</p> <p>12 else?</p> <p>13 A. You have drafters. You have</p> <p>14 planners. You have third party, I can't think</p> <p>15 of what they're called, third party group.</p> <p>16 Q. And out of all those people on the</p> <p>17 floor at 900 Race, did you have any</p> <p>18 conversation with anyone about the fact that</p> <p>19 you were RIFed?</p> <p>20 A. No.</p> <p>21 Q. And did you have any conversation</p> <p>22 with any of them about the fact that you filed</p> <p>23 a lawsuit?</p> <p>24 A. No.</p> <p>25 Q. And so I am going to name some</p>
<p style="text-align: right;">162</p> <p>1 A. I can't answer that.</p> <p>2 Q. And why is that, why can't you</p> <p>3 answer it?</p> <p>4 A. I don't know.</p> <p>5 Q. Well, is there anyone that you feel</p> <p>6 have facts that would support your claim of</p> <p>7 that your -- that your selection for</p> <p>8 termination in connection with the RIF was</p> <p>9 based on some type of discrimination, either</p> <p>10 your race, your disability, your age or the</p> <p>11 fact that you took FMLA leave?</p> <p>12 A. The people I work with.</p> <p>13 Q. So what facts would they have? And</p> <p>14 when you say the people you work with --</p> <p>15 A. They would be able to tell the type</p> <p>16 of work I did and also the type of treatment I</p> <p>17 received, whether it was negative or positive,</p> <p>18 they would know.</p> <p>19 Q. And so in terms of that negative</p> <p>20 and positive treatment, you've identified all</p> <p>21 the negative treatment that you have received</p> <p>22 during your employment, correct?</p> <p>23 A. Yes.</p> <p>24 Q. Yes?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">164</p> <p>1 individuals that you have listed on your</p> <p>2 initial disclosure of people who have</p> <p>3 information regarding your claims of</p> <p>4 discrimination and your termination. Kelly</p> <p>5 Blunt, Engineer III, correct? You have her</p> <p>6 identified.</p> <p>7 A. Yes.</p> <p>8 Q. What information does Kelly have?</p> <p>9 A. She worked closely with me and in</p> <p>10 that office and other offices I worked at.</p> <p>11 Q. And so what specific information</p> <p>12 does she have of any claim of discrimination</p> <p>13 that you have?</p> <p>14 A. The actual, the people that were</p> <p>15 RIFed over the past three or four years who has</p> <p>16 been RIFed and their ethnicity.</p> <p>17 Q. And how do you know she would know</p> <p>18 this?</p> <p>19 A. Because she worked in that</p> <p>20 organizations on which they worked.</p> <p>21 Q. And did you ever have any</p> <p>22 discussions with Kelly about people who have</p> <p>23 been RIFed?</p> <p>24 A. Yes.</p> <p>25 Q. Yes did you say?</p>

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<p style="text-align: right;">165</p> <p>1 A. Yes.</p> <p>2 Q. Tell me what those discussions</p> <p>3 were?</p> <p>4 A. The discussion was about who was</p> <p>5 RIFed and over the past four years.</p> <p>6 Q. And when did you have that</p> <p>7 discussion?</p> <p>8 A. Before the actual RIF day.</p> <p>9 Q. Did you think you were going to be</p> <p>10 RIFed?</p> <p>11 A. No.</p> <p>12 Q. Who did you think was going to be</p> <p>13 RIFed?</p> <p>14 A. I couldn't say.</p> <p>15 Q. But you knew someone was going to</p> <p>16 be RIFed in the group, right?</p> <p>17 A. Yes.</p> <p>18 Q. And that was made clear to your</p> <p>19 group that someone was going to be RIFed,</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. And tell me what Kelly said to you</p> <p>23 when you discussed who was RIFed during the</p> <p>24 past four years?</p> <p>25 A. We talked about how many people had</p>	<p style="text-align: right;">167</p> <p>1 Q. And so what is Kelly Blunt's</p> <p>2 ethnicity?</p> <p>3 A. African-American.</p> <p>4 Q. And what did Kelly, you and Kelly</p> <p>5 Blunt talk about in terms of the 12 people that</p> <p>6 had been laid off?</p> <p>7 A. We were talking about working with</p> <p>8 them and how we didn't expect them to be RIFed.</p> <p>9 Q. And were the 12 individuals that</p> <p>10 you were talking about, were they</p> <p>11 African-American?</p> <p>12 A. Some were.</p> <p>13 Q. And were some white?</p> <p>14 A. Yes.</p> <p>15 Q. And what was the breakdown, do you</p> <p>16 know?</p> <p>17 A. I can't remember right now.</p> <p>18 Q. Were you talking about who had been</p> <p>19 RIFed in general or were you talking about the</p> <p>20 race and ethnicity of those who had been RIFed?</p> <p>21 A. Talking about the RIF in general.</p> <p>22 Q. And was it that you were surprised</p> <p>23 about the people who were RIFed?</p> <p>24 A. Yes.</p> <p>25 Q. And why were you surprised and why</p>
<p style="text-align: right;">166</p> <p>1 been RIFed over the past three years.</p> <p>2 Q. And how many were RIFed over the</p> <p>3 last four years?</p> <p>4 A. I believe we said 12.</p> <p>5 Q. Twelve. And when did you have this</p> <p>6 discussion, right at the time of the RIF?</p> <p>7 A. No, before the RIF in February of</p> <p>8 2014.</p> <p>9 Q. February 2014.</p> <p>10 A. I'm sorry.</p> <p>11 Q. February 2015?</p> <p>12 A. Yes.</p> <p>13 Q. And that was when the RIF was, when</p> <p>14 you understood that a RIF was going to take</p> <p>15 place that year?</p> <p>16 A. Yes, that was the meeting.</p> <p>17 Q. And so who conducted the meeting</p> <p>18 and what was said at the meeting?</p> <p>19 A. Mr. Magee held the meeting.</p> <p>20 Q. What did he say?</p> <p>21 A. He told us that a RIF was coming</p> <p>22 and people had to be off payroll by May 22.</p> <p>23 The decision would be made and we would be told</p> <p>24 on April 23 and that we had to be available in</p> <p>25 the office at the time.</p>	<p style="text-align: right;">168</p> <p>1 was she surprised? What was the conversation</p> <p>2 about?</p> <p>3 A. The total conversation was the fact</p> <p>4 that with all of the work that needed to be</p> <p>5 done, we were surprised that so many people</p> <p>6 were let go.</p> <p>7 Q. So it was the volume of individuals</p> <p>8 impacted that you were both surprised by,</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. And you did not have a discussion</p> <p>12 about the race of the people impacted?</p> <p>13 A. No, that wasn't even part of the</p> <p>14 conversation.</p> <p>15 Q. And Kelly was retained; is that</p> <p>16 right?</p> <p>17 A. Yes.</p> <p>18 Q. And is Kelly still an employee of</p> <p>19 Verizon?</p> <p>20 A. Yes.</p> <p>21 Q. And how old is Kelly?</p> <p>22 A. She's in her forties.</p> <p>23 Q. In her forties. Is she a long time</p> <p>24 Verizon employee?</p> <p>25 A. Yes, I believe she has 20 plus</p>

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<p style="text-align: right;">169</p> <p>1 years.</p> <p>2 Q. George Dutton, what does George</p> <p>3 Dutton know about your claim of conversation?</p> <p>4 A. George Dutton is an outside</p> <p>5 foreman, but he has retired.</p> <p>6 Q. Have you had any conversation with</p> <p>7 George Dutton about your termination or your</p> <p>8 lawsuit?</p> <p>9 A. About my termination.</p> <p>10 Q. What was the discussion about your</p> <p>11 termination?</p> <p>12 A. He said he couldn't believe it.</p> <p>13 Q. Was he, so he's an outside foreman.</p> <p>14 Who does he work for?</p> <p>15 A. He worked for, what's his name, I</p> <p>16 believe he worked for Dennis Coyle.</p> <p>17 Q. I can't hear you.</p> <p>18 A. I believe he worked with Dennis</p> <p>19 Coyle.</p> <p>20 Q. Dennis Coyle. So when did you talk</p> <p>21 with George?</p> <p>22 A. I talked with George in, right</p> <p>23 after the RIF, about a month later.</p> <p>24 Q. Did you call him up?</p> <p>25 A. No, he called me.</p>	<p style="text-align: right;">171</p> <p>1 Q. So his opinion was it should have</p> <p>2 been based on seniority; is that right?</p> <p>3 A. Yes.</p> <p>4 Q. Did he say anything specifically</p> <p>5 about discrimination they believed you were</p> <p>6 discriminated against?</p> <p>7 A. No.</p> <p>8 Q. David Perry, what does David know</p> <p>9 about your claims of discrimination?</p> <p>10 A. He's the last person who came to</p> <p>11 the office.</p> <p>12 Q. So that was the person that George</p> <p>13 was talking about that he felt should have</p> <p>14 been --</p> <p>15 A. Yes.</p> <p>16 Q. What does David know, have you had</p> <p>17 any conversations with David about your belief</p> <p>18 that you were discriminated against?</p> <p>19 A. No.</p> <p>20 Q. No. Okay. Tony Portolese, what</p> <p>21 does he know about your claims of</p> <p>22 discrimination? Did you have any conversations</p> <p>23 with him about --</p> <p>24 A. I haven't spoken to him.</p> <p>25 Q. Joseph Hui, you've identified</p>
<p style="text-align: right;">170</p> <p>1 Q. Were you friendly?</p> <p>2 A. Yes.</p> <p>3 Q. And what did he say?</p> <p>4 A. He said that he couldn't believe</p> <p>5 with all the work that I did and dedication of</p> <p>6 getting the job done that I was let go.</p> <p>7 Q. And does George have a lawsuit</p> <p>8 against the company, do you know?</p> <p>9 A. No, I don't know.</p> <p>10 Q. And did you ask him if he would be</p> <p>11 a witness?</p> <p>12 A. No.</p> <p>13 Q. Did you talk with him about, did</p> <p>14 you tell him that you felt that you were</p> <p>15 discriminated against?</p> <p>16 A. No.</p> <p>17 Q. Did he say anything about you being</p> <p>18 discriminated against?</p> <p>19 A. Yes.</p> <p>20 Q. What did he say?</p> <p>21 A. He said that he didn't believe that</p> <p>22 the people that they held should have been</p> <p>23 held. That the last person in, the last person</p> <p>24 that was brought into the office should have</p> <p>25 been gone.</p>	<p style="text-align: right;">172</p> <p>1 before. Did you have any conversations with</p> <p>2 Joseph about your termination?</p> <p>3 A. Yes.</p> <p>4 Q. And what was that? Can you tell me</p> <p>5 when you had those conversations and what those</p> <p>6 conversations were?</p> <p>7 A. We had a conversation a week or two</p> <p>8 later.</p> <p>9 Q. And did he call you?</p> <p>10 A. Yes.</p> <p>11 Q. And what did he say?</p> <p>12 A. He was upset. And he said that he</p> <p>13 didn't understand how they selected people.</p> <p>14 That there was not -- the information wasn't</p> <p>15 forthcoming.</p> <p>16 Q. Did you say anything that you felt</p> <p>17 you were discriminated against?</p> <p>18 A. No.</p> <p>19 Q. Did he say he thought you were</p> <p>20 discriminated against?</p> <p>21 A. He said I was treated unfairly.</p> <p>22 Q. And did he say why he felt you were</p> <p>23 treated unfairly?</p> <p>24 A. No.</p> <p>25 Q. Did he say that it should have been</p>

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<p style="text-align: right;">173</p> <p>1 seniority as well?</p> <p>2 A. Yes.</p> <p>3 Q. And is that why he thought you were</p> <p>4 treated unfairly, that the last in should have</p> <p>5 been the one terminated as opposed to someone</p> <p>6 with seniority?</p> <p>7 A. Yes.</p> <p>8 Q. Did he say anything else?</p> <p>9 A. No.</p> <p>10 Q. What about Steven Murphy?</p> <p>11 A. I haven't spoken to him.</p> <p>12 Q. What about Thomas Hodge? Thomas</p> <p>13 was the one who provided some training to you,</p> <p>14 right?</p> <p>15 A. The only time I spoke to him was</p> <p>16 just to say hello.</p> <p>17 Q. Maria Cesare?</p> <p>18 A. I've never spoken to her. Are we</p> <p>19 talking about the RIF, no.</p> <p>20 Q. So my question about all these</p> <p>21 people that are identified on your</p> <p>22 self-executing disclosure is what information</p> <p>23 did they have about your claim of</p> <p>24 discrimination and/or about your termination.</p> <p>25 Maria Cesare, does she have any information</p>	<p style="text-align: right;">175</p> <p>1 Q. And did you have conversations with</p> <p>2 Diedre about your termination?</p> <p>3 A. No.</p> <p>4 Q. Did she have conversations with you</p> <p>5 about her termination?</p> <p>6 A. No.</p> <p>7 Q. Did you ever have any discussion</p> <p>8 about your belief that you were discriminated</p> <p>9 against?</p> <p>10 A. With her, no.</p> <p>11 Q. Did she ever have any conversations</p> <p>12 with you that she felt she was discriminated</p> <p>13 against?</p> <p>14 A. No.</p> <p>15 Q. Did you ever talk with anyone about</p> <p>16 Diedre Johns?</p> <p>17 A. No.</p> <p>18 Q. Ed Macintosh, who is that?</p> <p>19 A. Ed Macintosh is an Engineer III who</p> <p>20 came in the department right before the RIF.</p> <p>21 Q. Right before the RIF. Did he</p> <p>22 report to Magee?</p> <p>23 A. No, Mr. Gross.</p> <p>24 Q. Mr. Gross. Did you have any</p> <p>25 firsthand knowledge of Ed Macintosh's</p>
<p style="text-align: right;">174</p> <p>1 about your claims of discrimination that you</p> <p>2 know of?</p> <p>3 A. Just my capability of doing the</p> <p>4 job.</p> <p>5 Q. Matt Kehr, K-E-H-R, what does Matt</p> <p>6 know about your claims of discrimination?</p> <p>7 A. Matt works in another department.</p> <p>8 He replaced Diedre Johns.</p> <p>9 Q. Is he a white employee?</p> <p>10 A. Yes.</p> <p>11 Q. Have you had any conversations with</p> <p>12 him about your termination?</p> <p>13 A. No.</p> <p>14 Q. Any conversations about your</p> <p>15 lawsuit?</p> <p>16 A. Yes.</p> <p>17 Q. Diedre Johns was someone who was</p> <p>18 terminated by another RIF?</p> <p>19 A. Yes.</p> <p>20 Q. And you didn't work directly with</p> <p>21 Diedre or did you?</p> <p>22 A. No, by the same RIF.</p> <p>23 Q. Oh, by the same RIF. And so Diedre</p> <p>24 is African-American; is that right?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">176</p> <p>1 employment?</p> <p>2 A. He left a group called the CSSC in</p> <p>3 Delaware and came to engineering.</p> <p>4 Q. How old is Macintosh?</p> <p>5 A. He's over 40.</p> <p>6 Q. I can't hear you.</p> <p>7 A. He's over 40.</p> <p>8 Q. How long was he employed at</p> <p>9 Verizon, do you know?</p> <p>10 A. I couldn't tell you.</p> <p>11 Q. Do you know if he had any</p> <p>12 disability or ever took a leave of absence?</p> <p>13 A. Not that I know of.</p> <p>14 Q. And is he Caucasian?</p> <p>15 A. Yes.</p> <p>16 Q. What information does he have about</p> <p>17 your claims of discrimination?</p> <p>18 A. When Ed came into the building,</p> <p>19 when Ed came into engineering, they made a</p> <p>20 position for him to come in. He had previously</p> <p>21 been in engineering years ago. So when the RIF</p> <p>22 came, he was already brought back to</p> <p>23 engineering, so we didn't -- I didn't</p> <p>24 understand how can you have a RIF and you just</p> <p>25 brought people in.</p>

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<p style="text-align: right;">177</p> <p>1 Q. Was the RIF already announced when 2 Ed was brought back? 3 A. Yes. 4 Q. So it was prior to the RIF being 5 announced? 6 A. Yes. 7 Q. So prior to February 2015, correct? 8 A. Yes. 9 Q. Do you know when he came in? 10 A. Not exactly, no. 11 Q. Brian Magee, we know, there's 12 nothing else that Brian knows or Brian said to 13 you or you said to Brian that you haven't 14 testified to? 15 A. Correct. 16 Q. So we have everything that we need 17 to know about Brian in terms of your claim of 18 discrimination, right and your termination, 19 right? 20 A. Yes. 21 Q. Is that yes? 22 A. Yes, I'm sorry, yes. 23 Q. I just want to give you the chance 24 to tell me everything. 25 A. Yes.</p>	<p style="text-align: right;">179</p> <p>1 of discrimination, anything? 2 A. Nothing. He can only profess to my 3 work ethic. 4 Q. And how can he profess as to your 5 work ethic? 6 A. I worked for him for years. 7 Q. Did you have a good relationship 8 with him? 9 A. Yes. 10 Q. You indicated that you have your 11 planner where you had kept notes and 12 information. Do you have any other documents 13 that you kept information either about your 14 lawsuit? 15 A. No. 16 Q. About your employment? 17 A. No. 18 Q. Just your planner? 19 A. Yes. 20 Q. And we're reminding counsel that we 21 would like a copy of that. 22 You applied for unemployment 23 compensation? 24 A. Yes. 25 Q. So this will be Plaintiff's Exhibit</p>
<p style="text-align: right;">178</p> <p>1 Q. All right. Ernest Padovani? 2 A. Yes. 3 Q. Who is Ernest? 4 A. Ernest is an Engineer III who works 5 in Delaware. 6 Q. And what does Ernest know about 7 your claims of termination and discrimination? 8 A. He's just one of the group. 9 Q. Did you ever have any conversations 10 with him about either your complaint or your 11 termination? 12 A. No. 13 Q. Did he ever try to contact you? 14 A. No. 15 Q. Joe Scelsa? 16 A. Scelsa. 17 Q. Scelsa, sorry. What does Joe know 18 about your claim of discrimination? 19 A. Joe is one of the people that took 20 the work that I had. He's one of the two that 21 is now performing the work I had. 22 Q. So he knows that you were 23 terminated, obviously? 24 A. Yes. 25 Q. What does he know about your claim</p>	<p style="text-align: right;">180</p> <p>1 6 I think. 2 ----- 3 (Unemployment Document Bates P46 to 4 P47 marked Walker Exhibit 6 for 5 identification.) 6 ----- 7 BY MS. BEGLEY: 8 Q. And can you take a look at 9 Exhibit 6, Mrs. Walker? So it looks like from 10 the document that you applied for unemployment 11 comp on 5/24/15; is that right? 12 A. Yes. 13 Q. So it was two days after the 14 termination of your effective date, right, your 15 termination effective date, right? 16 A. Yes. 17 Q. And you were granted unemployment 18 comp; is that correct? 19 A. Yes. 20 Q. Did you file an application for 21 unemployment comp? 22 A. Yes. 23 Q. Yeah. So I don't have a copy of 24 that. I don't know whether we received a copy 25 or not. Do you have a copy of your application</p>

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<p style="text-align: right;">181</p> <p>1 for unemployment compensation?</p> <p>2 A. I believe I do.</p> <p>3 Q. If you haven't given it to your</p> <p>4 counsel, will you do so?</p> <p>5 A. I think I sent her a copy, but I'll</p> <p>6 send another one.</p> <p>7 Q. And so in looking at this document</p> <p>8 it appears that you received total wages of</p> <p>9 98,478; is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. So is that the amount that you</p> <p>12 received from the State of Pennsylvania?</p> <p>13 A. No, no.</p> <p>14 Q. So what amount did you receive from</p> <p>15 the State of Pennsylvania for unemployment</p> <p>16 compensation?</p> <p>17 A. In the fourth paragraph down.</p> <p>18 Q. Fourth paragraph down. Your</p> <p>19 benefit entitlement, your max benefit</p> <p>20 entitlement, it's 14,898, is that what you</p> <p>21 received?</p> <p>22 A. Yes.</p> <p>23 Q. Did you have to attend any kind of</p> <p>24 hearing?</p> <p>25 A. No.</p>	<p style="text-align: right;">183</p> <p>1 university about an online educational program.</p> <p>2 Did you ever contact, return that communication</p> <p>3 from Ernest Cochran about an opportunity to go</p> <p>4 back to school?</p> <p>5 A. No, there's supposed to speak next</p> <p>6 week.</p> <p>7 Q. And what are you going to speak</p> <p>8 about?</p> <p>9 A. About the healthcare industry.</p> <p>10 Q. And we're going to just make this</p> <p>11 as an exhibit since we're talking about it.</p> <p>12 That will be Exhibit 7.</p> <p>13 -----</p> <p>14 (Cochran Letter dated 8/18/16</p> <p>15 marked Walker Exhibit 7 for</p> <p>16 identification.)</p> <p>17 -----</p> <p>18 BY MS. BEGLEY:</p> <p>19 Q. When did you first reach out and</p> <p>20 contact AIU about continuing your education?</p> <p>21 A. I believe that was the 15th.</p> <p>22 Q. The 15th. Okay. And you have a</p> <p>23 call scheduled to talk with Mr. Cochran for</p> <p>24 next week?</p> <p>25 A. Yes. I'm going to talk to him next</p>
<p style="text-align: right;">182</p> <p>1 Q. Or were you just given that amount?</p> <p>2 A. I was given that amount and I had</p> <p>3 to attend a class.</p> <p>4 Q. And you had to provide information</p> <p>5 that you were making an effort to obtain</p> <p>6 employment, correct?</p> <p>7 A. Yes.</p> <p>8 Q. And what kind of documents did you</p> <p>9 provide to unemployment comp?</p> <p>10 A. They told me to make a list of the</p> <p>11 jobs I applied.</p> <p>12 Q. And did you provide a list to</p> <p>13 unemployment comp?</p> <p>14 A. Yes.</p> <p>15 Q. Oh, I don't believe we have that</p> <p>16 document either. We'll mark it on the</p> <p>17 transcript and would like that document as</p> <p>18 well.</p> <p>19 I just wanted to go back to, I</p> <p>20 had mentioned earlier I saw a document that you</p> <p>21 had communicated with a college, the</p> <p>22 international online college. Here, let me get</p> <p>23 the correct name. On Thursday, August 18,</p> <p>24 2016, so just recently, you had communicated</p> <p>25 with AIU, which is American Intercontinental</p>	<p style="text-align: right;">184</p> <p>1 week.</p> <p>2 Q. When next week are you talking to</p> <p>3 him?</p> <p>4 A. I believe, I believe Wednesday, the</p> <p>5 31st.</p> <p>6 Q. Is there a communication that</p> <p>7 confirms that you're going to be calling him?</p> <p>8 A. No, I just left a message for him.</p> <p>9 Q. And what degree are you going to be</p> <p>10 pursuing?</p> <p>11 A. I'm looking for a degree in nursing,</p> <p>12 not nursing, LPN.</p> <p>13 Q. An LPN?</p> <p>14 A. Uh-huh.</p> <p>15 Q. And is this an online degree or</p> <p>16 would this be actually going to school and</p> <p>17 attending classes?</p> <p>18 A. Online.</p> <p>19 Q. Online. And how long does this</p> <p>20 program take to obtain the LPN degree?</p> <p>21 A. We didn't get into the particulars.</p> <p>22 Q. Since you already have a college</p> <p>23 degree and a master's, why would you become an</p> <p>24 LPN? Why wouldn't you go ahead and try to</p> <p>25 become an RN if you're going to get into</p>

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<p style="text-align: right;">185</p> <p>1 healthcare?</p> <p>2 A. I need a job, so I need to be</p> <p>3 trained in something that I can do right away</p> <p>4 and then go farther after I achieved that</p> <p>5 degree.</p> <p>6 Q. And do you know how long it takes</p> <p>7 to get this LPN degree?</p> <p>8 A. After looking online, I think it</p> <p>9 said 18, 18 months to two years.</p> <p>10 Q. And what's the tuition?</p> <p>11 A. We didn't get into that either.</p> <p>12 Q. And how would you pay for the</p> <p>13 tuition?</p> <p>14 A. I'd have to take money out of my</p> <p>15 401K.</p> <p>16 Q. Other than what you've already</p> <p>17 communicated to me in the earlier part of the</p> <p>18 day about those three individuals that were</p> <p>19 retained that you feel you're more qualified</p> <p>20 than, are there any other people that were</p> <p>21 retained that you believe you are more</p> <p>22 qualified than?</p> <p>23 A. Those are the main three.</p> <p>24 Q. So it was, I'm going to</p> <p>25 mispronounce his name again, Scelsa, Perry and</p>	<p style="text-align: right;">187</p> <p>1 A. Just my minister of the church.</p> <p>2 Q. And what's the minister's name?</p> <p>3 A. Carl Cunningham.</p> <p>4 Q. Carl Cunningham?</p> <p>5 A. No, Reverend Cunningham.</p> <p>6 Q. Reverend Cunningham. And how does</p> <p>7 Reverend Cunningham know about the emotional</p> <p>8 distress you've experienced?</p> <p>9 A. We've talked about how you perceive</p> <p>10 yourself as doing a good job and you find that</p> <p>11 other people don't think you're doing a good</p> <p>12 job, but you know you're giving your all and</p> <p>13 how you have to step back and just live day to</p> <p>14 day, because you can't change it. Things like</p> <p>15 that.</p> <p>16 Q. And so did you go to him for any</p> <p>17 kind of spiritual therapy over the years?</p> <p>18 A. Yes, yes.</p> <p>19 Q. And when did you start doing that?</p> <p>20 A. When, back when my mother-in-law</p> <p>21 died.</p> <p>22 Q. And when was that?</p> <p>23 A. 2009.</p> <p>24 Q. 2009. So how often did you meet</p> <p>25 with Reverend Cunningham for spiritual advice?</p>
<p style="text-align: right;">186</p> <p>1 I think it's Tony Portolese. Or is that it?</p> <p>2 A. Yes.</p> <p>3 Q. Is that it?</p> <p>4 A. Yes.</p> <p>5 Q. I just want to make sure we're on</p> <p>6 the same page.</p> <p>7 And then I might have asked you</p> <p>8 this, and if I did, forgive me, have you talked</p> <p>9 with Brian Newman about your lawsuit --</p> <p>10 A. No.</p> <p>11 Q. -- or the fact you feel you have</p> <p>12 been discriminated against?</p> <p>13 A. No.</p> <p>14 Q. Do you know whether Brian Newman</p> <p>15 has a suit against the company?</p> <p>16 A. No.</p> <p>17 Q. Is there anyone else in your family</p> <p>18 that you've discussed your lawsuit with?</p> <p>19 A. My husband.</p> <p>20 Q. You've testified earlier about the</p> <p>21 emotional distress you have experienced as a</p> <p>22 result of your termination. Have you ever</p> <p>23 talked with anyone about the emotional distress</p> <p>24 that you've experienced or is there anyone who</p> <p>25 has knowledge of this?</p>	<p style="text-align: right;">188</p> <p>1 A. Whenever I start to feel that</p> <p>2 things were piling up.</p> <p>3 Q. And so and again, I'm sorry, I</p> <p>4 didn't hear you, was it when your mother-in-law</p> <p>5 died?</p> <p>6 A. Yes.</p> <p>7 Q. And so that was 2008 did you say?</p> <p>8 A. 2009.</p> <p>9 Q. 2009, you started seeking spiritual</p> <p>10 guidance from Reverend Cunningham?</p> <p>11 A. Yes.</p> <p>12 Q. And then when were things piling</p> <p>13 up? What other things were occurring in your</p> <p>14 life?</p> <p>15 A. I was just dealing with the</p> <p>16 day-to-day problems after my mother-in-law</p> <p>17 died.</p> <p>18 Q. And what were those problems?</p> <p>19 A. Disgruntled family members and just</p> <p>20 things of that nature.</p> <p>21 Q. And why were family members</p> <p>22 disgruntled?</p> <p>23 A. They felt that they were not</p> <p>24 rewarded when she passed away.</p> <p>25 Q. And were you and your -- was there</p>

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<p style="text-align: right;">189</p> <p>1 a will or an estate and were you and your</p> <p>2 husband recipients?</p> <p>3 A. My husband.</p> <p>4 Q. Your husband was responsible for</p> <p>5 the estate?</p> <p>6 A. Yes.</p> <p>7 Q. And did your husband receive the</p> <p>8 largest percent from the estate?</p> <p>9 A. Yes.</p> <p>10 Q. And were there brothers and sisters</p> <p>11 who weren't happy with that?</p> <p>12 A. Not brothers and sisters, but</p> <p>13 grandchildren.</p> <p>14 Q. Grandchildren. Was your husband</p> <p>15 the only living son --</p> <p>16 A. No.</p> <p>17 Q. -- child? What about the other</p> <p>18 children, did they receive from the estate?</p> <p>19 A. Yes.</p> <p>20 Q. But did your husband receive the</p> <p>21 most since he was the executor?</p> <p>22 A. Not really, no.</p> <p>23 Q. Did you and your husband help to</p> <p>24 take care of your mother-in-law?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">191</p> <p>1 died, she was not married; is that right?</p> <p>2 A. No.</p> <p>3 Q. And so her whole estate was</p> <p>4 distributed to her family?</p> <p>5 A. Yes.</p> <p>6 Q. And how much did you and your</p> <p>7 husband receive from that?</p> <p>8 A. Nothing.</p> <p>9 Q. Nothing?</p> <p>10 A. Nothing.</p> <p>11 Q. So why were the other kids, why</p> <p>12 were the grandkids disgruntled?</p> <p>13 A. Because they felt they didn't get</p> <p>14 enough.</p> <p>15 Q. Well, how could you not get enough,</p> <p>16 if you guys as the children didn't receive</p> <p>17 anything. Was her house bequeathed to you?</p> <p>18 A. My son.</p> <p>19 Q. To your son. And is that what they</p> <p>20 were upset about?</p> <p>21 A. Yes.</p> <p>22 Q. And what was the value of the</p> <p>23 house?</p> <p>24 A. I have no idea.</p> <p>25 Q. Does your son own the house still?</p>
<p style="text-align: right;">190</p> <p>1 Q. And what was her reason for death?</p> <p>2 What happened to her?</p> <p>3 A. Lung cancer.</p> <p>4 Q. Lung cancer. And did you help</p> <p>5 nurse her through that period of time?</p> <p>6 A. Yes.</p> <p>7 Q. I'm sure that was stressful.</p> <p>8 A. Yes.</p> <p>9 Q. And sad for both you and your</p> <p>10 husband.</p> <p>11 A. Yes.</p> <p>12 Q. How involved were you in helping to</p> <p>13 nurse your mother-in-law between, you know, the</p> <p>14 time that she was diagnosed and her death?</p> <p>15 A. I was responsible from the time I</p> <p>16 got home from work until I put her to bed</p> <p>17 around ten, 11:00 o'clock.</p> <p>18 Q. Does she live with you?</p> <p>19 A. No, she lived down the street.</p> <p>20 Q. Did she live with her husband?</p> <p>21 A. No.</p> <p>22 Q. So the father-in-law was not</p> <p>23 married to your mother-in-law; is that right?</p> <p>24 A. Right.</p> <p>25 Q. And so when your mother-in-law</p>	<p style="text-align: right;">192</p> <p>1 A. Yes.</p> <p>2 Q. But he doesn't live at the house?</p> <p>3 A. No.</p> <p>4 Q. Does he rent the house out?</p> <p>5 A. Yes.</p> <p>6 Q. Did he ever live in the house?</p> <p>7 A. No.</p> <p>8 Q. And your husband got nothing?</p> <p>9 A. No.</p> <p>10 Q. And then you took care of your</p> <p>11 father-in-law, right?</p> <p>12 A. Yes.</p> <p>13 Q. And when your father-in-law died,</p> <p>14 did money come to you and your husband as a</p> <p>15 result of his passing?</p> <p>16 A. No.</p> <p>17 Q. What other things came down on you</p> <p>18 that you needed to go and talk to Reverend</p> <p>19 Cunningham about?</p> <p>20 A. Just not being able to find a job</p> <p>21 was getting a little stressful.</p> <p>22 Q. And how often did you go to</p> <p>23 Cunningham about these issues?</p> <p>24 A. I went to him twice.</p> <p>25 Q. Twice. And can you tell me when</p>

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<p style="text-align: right;">193</p> <p>1 the two times?</p> <p>2 A. In, right after it happened, right</p> <p>3 after the RIF and in I believe September of</p> <p>4 2015.</p> <p>5 Q. And why did you go to him in</p> <p>6 September of 2015?</p> <p>7 A. Because it seemed like I couldn't</p> <p>8 find a job. So that's when I started</p> <p>9 volunteering and mentoring.</p> <p>10 Q. And did he suggest you do that?</p> <p>11 A. No, he told me to do what I was</p> <p>12 meant to do.</p> <p>13 Q. And what was that?</p> <p>14 A. Volunteer and mentor.</p> <p>15 Q. And did you believe that was true,</p> <p>16 that was what you should be doing?</p> <p>17 A. Yes.</p> <p>18 Q. And is that what you've kind of</p> <p>19 dedicated your life to, volunteering and</p> <p>20 mentoring?</p> <p>21 A. Yes.</p> <p>22 Q. Can we just take the tax returns</p> <p>23 and have her take a look at the tax returns,</p> <p>24 please. So you provided your tax returns.</p> <p>25 This is eight, am I right?</p>	<p style="text-align: right;">195</p> <p>1 A. Yes.</p> <p>2 Q. And then we have unemployment comp</p> <p>3 of 14,638, right. And that's the unemployment</p> <p>4 compensation that you received; is that</p> <p>5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. Under the refunds, it looks like</p> <p>8 you got a refund of \$6,500; is that right?</p> <p>9 A. Uh-huh.</p> <p>10 Q. Under both your occupation and your</p> <p>11 spouse's occupation, it says you're retired.</p> <p>12 Have you retired from employment at Verizon?</p> <p>13 Have you filled out the necessary papers to be</p> <p>14 considered retired from Verizon?</p> <p>15 A. What necessary papers?</p> <p>16 Q. In order to receive retirement</p> <p>17 funds from Verizon, pension and retirement</p> <p>18 funds.</p> <p>19 A. I received my pension.</p> <p>20 Q. Your pension?</p> <p>21 A. Yes, my pension has rolled over.</p> <p>22 Q. Has rolled over?</p> <p>23 A. Yes.</p> <p>24 Q. When did you start receiving it?</p> <p>25 A. January 2015.</p>
<p style="text-align: right;">194</p> <p>1 -----</p> <p>2 (2015 Tax Returns Bates P143 to</p> <p>3 P150 marked Walker Exhibit 8 for</p> <p>4 identification.)</p> <p>5 -----</p> <p>6 BY MS. BEGLEY:</p> <p>7 Q. Mrs. Walker, please take a look at</p> <p>8 Exhibit 8, tax return for 2015 and if you look</p> <p>9 at, let's just look at the first page for 2015</p> <p>10 says wages, tips and other compensation,</p> <p>11 \$51,000. And Social Security wages it says</p> <p>12 53,904 and the employer is Verizon. What is,</p> <p>13 is this from what, is this a retirement</p> <p>14 payment? What is it?</p> <p>15 A. 53,904?</p> <p>16 Q. Yes. Or is it for the first half</p> <p>17 of the year?</p> <p>18 A. That's the first half of the year.</p> <p>19 Q. So this is your, so 53 was what you</p> <p>20 were paid prior to the effective date of</p> <p>21 May 22, 2015, correct?</p> <p>22 A. Yes.</p> <p>23 Q. On page 2 under pensions and</p> <p>24 annuities, we have \$3,697, is that your</p> <p>25 husband's pension?</p>	<p style="text-align: right;">196</p> <p>1 Q. January 2015, so on your tax</p> <p>2 returns, you've identified to the federal</p> <p>3 government that you're an engineer and you're</p> <p>4 retired, correct?</p> <p>5 A. Yes.</p> <p>6 Q. And you have a tax accountant that</p> <p>7 prepares this document for you?</p> <p>8 A. Yes.</p> <p>9 Q. Who is that?</p> <p>10 A. James, James Evans.</p> <p>11 Q. Who is it, I can't hear you?</p> <p>12 A. James Abans.</p> <p>13 Q. And where is he?</p> <p>14 A. In New Jersey.</p> <p>15 Q. In New Jersey. Where in New</p> <p>16 Jersey?</p> <p>17 A. In Deptford.</p> <p>18 Q. And how do you spell his last name?</p> <p>19 A. A-B-A-N-S.</p> <p>20 Q. And and is he in a service, does he</p> <p>21 work for a service?</p> <p>22 A. No.</p> <p>23 Q. He's an individual?</p> <p>24 A. Yes.</p> <p>25 Q. Under employee business expenses</p>

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<p style="text-align: right;">197</p> <p>1 and reimbursements, vehicle expenses, did you 2 have a company car? 3 A. No. 4 Q. So the vehicle expense, what was 5 that for? 6 A. Using my car to do surveys. 7 Q. To do surveys. Okay. And then 8 total expenses, we have, so parking fees, tolls 9 was that also to do your job? 10 A. Yes. 11 Q. Were those expenses reimbursed by 12 Verizon? 13 A. The only time they were reimbursed 14 is when I was using a Verizon vehicle. 15 Q. Noncash charitable contributions. 16 Let's go to the last page. Okay. So it looks 17 like and so all of this is your joint return, 18 right? 19 A. Yes. 20 Q. So if you look in the middle of the 21 page, first of all, you've got Salvation Army, 22 Salvation Army, Bargain Thrift, Bargain Thrift. 23 Did you donate clothes and books and shoes? 24 A. Clothes, furniture, a whole bunch 25 of stuff.</p>	<p style="text-align: right;">199</p> <p>1 Q. So that was your son's property, 2 right? 3 A. No, it was mine. He gave it to me. 4 Q. He gave it to you. And again, how 5 did you come up with the value? They're all 6 over \$3,500 in the same year, so between June 7 and January, you have about \$15,000 total in 8 that six-month period of contributions. That's 9 a lot. That's lot of money of contributions. 10 How did you come up with all those numbers? 11 A. Everything was prorated at a fair 12 market value. 13 Q. And do you have receipts for this 14 stuff? 15 A. Yes. 16 Q. Let's just go through your others. 17 So all of the information that you provided on 18 your tax return is true and correct, right? 19 A. Yes. 20 MS. BEGLEY: For 2014, it 21 will be nine. 22 ----- 23 (2014 Tax Return Bates P40 to P44 24 marked Walker Exhibit 9 for 25 identification.)</p>
<p style="text-align: right;">198</p> <p>1 Q. And then it says, note, if the 2 amount claimed as a deduction for the item is 3 500 or less, you don't have to complete. So 4 for the first one, you have 6/6/2015, how 5 acquired by donor purchased, donors' cost on 6 the adjusted basis. It says \$3,985 and then 7 fair market value I898. What did you donate 8 that was valued at almost \$4,000? 9 A. A bedroom set. 10 Q. I can't hear you. 11 A. A bedroom set. 12 Q. And then for 7/14/2015, so about a 13 month later, you donated another almost \$4,000 14 worth of items. What were those? 15 A. Coats, suits, books, shoes, a whole 16 bunch of stuff, electronics. 17 Q. How did you come up with that 18 almost \$4,000 of contributions? 19 A. Because some of it was new and they 20 were just laying around, so we got rid of it. 21 Q. And then 11/20, three months later, 22 another \$3,600, what was that, what were those 23 contributions? 24 A. That was for furniture and stuff my 25 son at left at my house.</p>	<p style="text-align: right;">200</p> <p>1 ----- 2 BY MS. BEGLEY: 3 Q. So for 2014, again, this is a joint 4 tax return, correct, for you and Eric Walker 5 and your total wages are 87,888, correct? 6 A. Yes. 7 Q. It doesn't look like anything for 8 your husband, right, your husband had no income 9 during this period? Let's just see. Oh, the 10 pension, so pension and annuities, your husband 11 had \$4,371; is that correct? 12 A. Yes. 13 Q. Is that what he receives a year? 14 A. Yes. 15 Q. And in 2014, that was your full 16 Verizon salary, correct? 17 A. Yes. Excuse me, that, that 4,000, 18 that included annuity. 19 Q. Annuity too? 20 A. Yes, with a pension. 21 Q. And so then let's look again at 22 your last page of charitable contributions. 23 And again, every single contribution that you 24 made, you made one in March, in June, in 25 September. So in a less than six-month period,</p>

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<p style="text-align: right;">201</p> <p>1 you have, again, right under \$4,000 each</p> <p>2 donation, you make as the donor's cost is under</p> <p>3 \$4,000. So that seems to be the number that</p> <p>4 you contribute every single time you make a</p> <p>5 donation, it's right under \$4,000?</p> <p>6 A. We purchase --</p> <p>7 Q. Who came up with those numbers?</p> <p>8 A. We purchase furniture from a thrift</p> <p>9 store. We refinished it and then we donate it</p> <p>10 back.</p> <p>11 Q. You purchase it, you refinish it,</p> <p>12 so you purchase the furniture for 4,000?</p> <p>13 A. No, no, no, no, we purchase a lot</p> <p>14 of furniture. We refinished it. And donated</p> <p>15 it back. Not all of this is furniture.</p> <p>16 Q. Who decides this number of right</p> <p>17 under \$4,000 for when of your, the costs of the</p> <p>18 items that you're donating?</p> <p>19 A. I do.</p> <p>20 Q. You do?</p> <p>21 A. Yes.</p> <p>22 Q. And how do you come up with that</p> <p>23 number each time?</p> <p>24 A. From the receipts from where I</p> <p>25 purchased stuff.</p>	<p style="text-align: right;">203</p> <p>1 same time each year, you do it in March, June</p> <p>2 and September as you had in 2014. And again,</p> <p>3 each contribution you value at right under</p> <p>4 \$4,000, three, so \$12,000 of contributions in a</p> <p>5 six-month time frame each time 3995, 3895 and</p> <p>6 3875 and you determine the number, right?</p> <p>7 A. Yes.</p> <p>8 MS. BEGLEY: We are at</p> <p>9 Exhibit number 11.</p> <p>10 -----</p> <p>11 (2012 Tax Return Bates P28 to P33</p> <p>12 marked Walker Exhibit 11 for</p> <p>13 identification.)</p> <p>14 -----</p> <p>15 BY MS. BEGLEY:</p> <p>16 Q. And so this is your, this is</p> <p>17 Exhibit 11. This is your 2012 joint tax</p> <p>18 return. Your wages, tips and compensation are</p> <p>19 84,339. The pension and annuities is 4292.</p> <p>20 And if we look at your contributions, again, in</p> <p>21 March, June and September, you have</p> <p>22 contributions again that you value at right</p> <p>23 under \$4,000 each time. With a final</p> <p>24 contribution in January or the first</p> <p>25 contribution in January of 500 bucks for an</p>
<p style="text-align: right;">202</p> <p>1 Q. And you have all of those receipts?</p> <p>2 A. Yes.</p> <p>3 Q. And obviously, the information you</p> <p>4 provided to the federal government is true and</p> <p>5 correct in both instances; is that right?</p> <p>6 A. Yes.</p> <p>7 MS. BEGLEY: So now we're</p> <p>8 going to look at Exhibit 10, which is</p> <p>9 your 2013 tax return.</p> <p>10 -----</p> <p>11 (2013 Tax Return Bates P34 to P39</p> <p>12 marked Walker Exhibit 10 for</p> <p>13 identification.)</p> <p>14 -----</p> <p>15 BY MS. BEGLEY:</p> <p>16 Q. And your 2013 tax return, again, is</p> <p>17 a joint tax return with your husband Eric.</p> <p>18 Your wages, tips and other compensation is</p> <p>19 87,951. You have a pension and annuity of</p> <p>20 \$4,331. And here we go with charitable</p> <p>21 contributions again. The second to last page.</p> <p>22 And for your charitable contributions, again,</p> <p>23 you're under that \$4,000 mark for each one.</p> <p>24 And again, it's right under, so you made three</p> <p>25 contributions and it looks like you do it the</p>	<p style="text-align: right;">204</p> <p>1 auction bid. Again, you're the one who</p> <p>2 determined the value of your contributions were</p> <p>3 right under \$4,000, correct?</p> <p>4 A. Yes.</p> <p>5 Q. You have alleged punitive damages</p> <p>6 against Verizon that Verizon acted maliciously</p> <p>7 when they terminated you. Can you tell me any</p> <p>8 factual basis you have for your allegation that</p> <p>9 you're entitled to punitive damages?</p> <p>10 A. I'm sorry, could you repeat that?</p> <p>11 Q. So you have alleged in your</p> <p>12 complaint that you're entitled to punitive</p> <p>13 damages. And my question to you is can you</p> <p>14 tell me a factual basis of why you believe</p> <p>15 you're entitled to punitive damages relating to</p> <p>16 the termination of your employment?</p> <p>17 MR. CHASE: Objection. You</p> <p>18 can answer.</p> <p>19 THE WITNESS: The fact that</p> <p>20 I did not plan on retiring. And if I</p> <p>21 had known it was coming, I would have</p> <p>22 made better choices, because I didn't</p> <p>23 plan on paying for benefits, insurance</p> <p>24 and all these extra expenses that came</p> <p>25 through, which I now have to live, take</p>

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<p style="text-align: right;">205</p> <p>1 out of my investments from my 401K. So</p> <p>2 it's, it's a hardship. It really is a</p> <p>3 hardship. But I'm trying to make it</p> <p>4 work.</p> <p>5 BY MS. BEGLEY:</p> <p>6 Q. So you've got the monthly</p> <p>7 healthcare bill that's about \$300?</p> <p>8 A. 314.</p> <p>9 Q. 314. And then what's the -- is it</p> <p>10 life insurance?</p> <p>11 A. Life insurance is 253 every</p> <p>12 quarter.</p> <p>13 Q. 253 each quarter. And was that</p> <p>14 something that was paid by Verizon before?</p> <p>15 A. No, we contributed, but it wasn't,</p> <p>16 if, it's a difference between living off of a</p> <p>17 monthly income as opposed to having a salary</p> <p>18 come in every two weeks.</p> <p>19 Q. And then what, what are the, are</p> <p>20 there other expenses that you're paying each</p> <p>21 month that you haven't told me about yet?</p> <p>22 A. No. Just those two major ones.</p> <p>23 MS. BEGLEY: I don't have</p> <p>24 any other questions. Does counsel have</p> <p>25 questions?</p>	<p style="text-align: right;">207</p> <p>1 C E R T I F I C A T I O N</p> <p>2</p> <p>3</p> <p>4 I HEREBY CERTIFY that the proceedings</p> <p>5 and evidence are contained fully and accurately</p> <p>6 in the stenographic notes taken by me upon the</p> <p>7 foregoing matter on August 25, 2016, and that</p> <p>8 this is a correct transcript of same.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14 _____</p> <p>15 Robin L. Clark</p> <p>16 Registered Professional Reporter</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21 (The foregoing certification of this</p> <p>22 transcript does not apply to any reproduction</p> <p>23 of the same by any means unless under the</p> <p>24 direct control and/or supervision of the</p> <p>25 certifying reporter.)</p>
<p style="text-align: right;">206</p> <p>1 MR. CHASE: I have nothing.</p> <p>2 MS. BEGLEY: All right.</p> <p>3 Thank you very much, Mrs. Walker.</p> <p>4 Thank you for being with us today. We</p> <p>5 appreciate it.</p> <p>6 THE WITNESS: The planner.</p> <p>7 The planner, you still want the</p> <p>8 planner.</p> <p>9 MS. BEGLEY: I still want</p> <p>10 the planner, yes and we'll write to</p> <p>11 counsel about that?</p> <p>12 THE WITNESS: Okay.</p> <p>13 MS. BEGLEY: All right. But</p> <p>14 if you provide it, that would be</p> <p>15 fantastic. Thanks so much.</p> <p>16 -----</p> <p>17 (Whereupon, the deposition was</p> <p>18 concluded at 2:59 p.m.)</p> <p>19 -----</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	

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Exhibit C

Effective Date	Job Title Held	Base Salary	Supervisor/Manager	Work Location
5/23/2015	Engineering III Specialist; Network Engineering & Operations	\$93,560	Brian Magee	900 Race Street, Philadelphia, PA
3/29/2015	Engineering III Specialist; Network Engineering & Operations	\$90,834	Brian Magee	900 Race Street, Philadelphia, PA
6/23/2013	Engineering III Specialist; Network Engineering & Operations	\$90,834	Brian Magee	900 Race Street, Philadelphia, PA
6/7/2013	Specialist; Network Engineering	\$90,834	Brian Magee	900 Race Street, Philadelphia, PA
3/3/2013	Specialist; Network Engineering	\$86,349	Brian Magee	900 Race Street, Philadelphia, PA
12/9/2012	Specialist; Network Engineering	\$86,349	Brian Magee	900 Race Street, Philadelphia, PA
4/1/2012	Section Manager; Network Engineering	\$86,349	Brian Magee	900 Race Street, Philadelphia, PA
12/9/2012	Section Manager; Network Engineering	\$86,349	Patricia McCoach	900 Race Street, Philadelphia, PA
2/12/2012	Section Manager; Network Engineering	\$86,349	Brian Magee	900 Race Street, Philadelphia, PA
11/13/2011	Section Manager; Network Engineering	\$82,349	Brian Magee	900 Race Street, Philadelphia, PA
2/13/2011	Section Manager; Network Engineering	\$77,688	Brian Magee	900 Race Street, Philadelphia, PA
12/26/2010	Section Manager; Network Engineering	\$77,688	Brian Magee	900 Race Street, Philadelphia, PA
3/21/2010	Supervisor; Network Engineering	\$77,688	Brian Magee	900 Race Street, Philadelphia, PA
2/14/2010	Supervisor; Network Engineering	\$74,700	Brian Magee	900 Race Street, Philadelphia, PA
2/15/2009	Supervisor; Network Engineering	\$71,700	Brian Magee	900 Race Street, Philadelphia, PA
2/17/2008	Supervisor; Network Engineering	\$68,500	Brian Magee	900 Race Street, Philadelphia, PA
12/16/2007	Supervisor; Network Engineering	\$68,500	Joseph Snyder	900 Race Street, Philadelphia, PA
2/18/2007	Network Engineer - Network Engineering	\$66,200	Brian Koniers	900 Race Street, Philadelphia, PA
3/5/2006	Network Engineer - Network Engineering	\$64,300	Brian Koniers	900 Race Street, Philadelphia, PA
6/3/2005	Network Engineer - Network Engineering	\$63,300	Brian Koniers	900 Race Street, Philadelphia, PA
12/19/2004	Network Engineer - Network Engineering	\$63,300	Brian Koniers	900 Race Street, Philadelphia, PA
8/1/2004	Assignment Technician	\$57,524	Brian Koniers	900 Race Street, Philadelphia, PA
2/29/2004	Assignment Technician	\$56,402	Brian Magee	900 Race Street, Philadelphia, PA
10/19/2003	Assignment Technician	\$56,402	Brian Koniers	900 Race Street, Philadelphia, PA
3/8/2002	Assignment Technician	\$53,713.80	Brian Koniers	900 Race Street, Philadelphia, PA
3/8/2001	Assignment Technician	\$52,147.80	Brian Koniers	900 Race Street, Philadelphia, PA
3/3/2000	Assignment Technician	\$50,138.10	Brian Koniers	900 Race Street, Philadelphia, PA

CONFIDENTIAL
Def. Walker_106

Exhibit D

6. Identify any documents made or kept by Plaintiff from the commencement of her employment with Defendants to the present, including but not limited to, any notes, diaries, calendars or any other written material which in any way relates to: (a) Defendants' actions as alleged in any part of the Amended Complaint; (b) any conversations with employees or former employees of Defendants concerning the allegations of the Amended Complaint; and (c) any alleged unlawful conduct you experienced as a result of employment with Defendants.

Plaintiff objects to this Interrogatory to the extent that it is ambiguous, vague, overbroad and/or not limited in temporal scope. Plaintiff was employed with Defendant for over 35 years, and much of that information has no bearing or relation to the issues in this suit. Without waiver and subject to said objections, Plaintiff refers Defendants to documents bates stamped P104 through P142 for responsive information.

7. Identify all facts that support your claim that Plaintiff was discriminated against based on her race.

Plaintiff objects to this Interrogatory to the extent that it is calls for Plaintiff to make a legal conclusion. Without waiver and subject to said objection, Plaintiff states that including but not limited to the following facts support her claim that she was discriminated against based on her race:

Plaintiff worked at a location with approximately six other individuals who were non-black employees and were not selected for this reduction in force ("RIF") [Anthony Portolese, Joseph Hui, Steven Murphy, Thomas Hodge, Maria Cesare and David Perry]; In or about May/June 2014, Defendant brought in a Caucasian individual, David Perry, to perform the same/similar job responsibilities as Plaintiff; Plaintiff had more experience within the engineering department than any of the other six individuals, Plaintiff had more seniority of anyone within her department and had been with the engineering department for at least thirty years. If Defendants allege that performance was a criterion used to assess individuals for the RIF, this would not result in Plaintiff's selection for same. In or about 2014, Defendants' management found Plaintiff to be performing at a level of sustained performance meeting objectives, requirements and expectations and periodically exceeding them, she received a 3% raise and a significant bonus. Plaintiff also had no discipline that would have impacted her ability to remain with the company; however, Steven Murphy was admonished for poor performance and actually had some of his job responsibilities removed which were provided to Plaintiff and another employee in or about the Fall 2014, but was still retained over Plaintiff. Joe Scelsa/Anthony Padovani both holding the same title as Plaintiff, were dressed down for performance based reasons, yet they retained their positions.

Further, Plaintiff was subject to various forms of mistreatment selectively based on race. For example, Defendants' management kept a watchful eye over Plaintiff's lunch breaks and working time whereas various white department peers would leave the workplace freely and take well over normal break periods without any type of scrutiny. At or about the time Plaintiff was

Exhibit E

Condensed Transcript
Testimony of:

BRIAN MAGEE

Date: June 30, 2016

Suzette Walker v. Verizon Services Corporation, et al.

No.: USDC E.D.PA 15-4031

R&K Reporting Inc.
Court Reporting Services
P.O. Box 1372
Levittown, Pennsylvania 19058
Phone: 215-946-7009
email: rkreporting@gmail.com

BRIAN MAGEE

Pages 1 to 4

Page 1		Page 3	
1	IN THE UNITED STATES DISTRICT COURT	1	I N D E X
2	FOR THE EASTERN DISTRICT OF PENNSYLVANIA	2	WITNESS
3		3	BRIAN MAGEE
4	SUZETTE WALKER : CIVIL ACTION	4	By Ms. Burke
5	Plaintiff, :	5	
6	v. :	6	
7	VERIZON SERVICES :	7	
8	CORPORATION :	8	E X H I B I T S
9	and :	9	MARKED DESCRIPTION
10	VERIZON PENNSYLVANIA, INC. :	10	Verizon-1 Bates stamp Def Walker 106
11	Defendants. :	11	Verizon-2 Employee rating form
12		12	Verizon-3 Rate and sank scoring criteria
13	Bensalem, Pennsylvania	13	Verizon-4 Organization list
14	June 30, 2016	14	Verizon-5 2013 Performance review
15	Pretrial examination of BRIAN MAGEE,	15	Verizon-6 2014 Performance review
16	taken on behalf of the Plaintiff at the Law	16	Verizon-7 Letter dated 5/16/13
17	Offices of Karpf, Karpf & Cerutti, 3331 Street	17	Verizon-8 Claim activity
18	Road, Bensalem, Pennsylvania, on the above	18	Verizon-9 Claim activity
19	date, commencing at 12:13 p.m., before Linda A.	19	Verizon-10 Doctor's note
20	Ricciardi, Certified Court Reporter.	20	Verizon-11 Claim activity
21		21	Verizon-12 Verification
22	R&K REPORTING	22	Verizon-13 Defendant's Responses to
23	Court Reporting Services	23	Plaintiff's Interrogatories
24	PO Box 1372	24	
	Levittown, Pennsylvania 19058-1372		
	Phone: 215-946-7009 Fax: 215-949-1867		
Page 2		Page 4	
1	APPEARANCES:	1	E X H I B I T S
2	KARPF, KARPf & CERUTTI, P.C.	2	MARKED DESCRIPTION
3	BY: CHRISTINE E. BURKE, ESQUIRE	3	Verizon-14 Bates stamp VZ Walker 755-813
4	3331 Street Road	4	Verizon-15 Short term incentive plan
5	Two Greenwood Square, Suite 128	5	Verizon-16 Bates stamp Def Walker 28-48
6	Bensalem, Pennsylvania 19020	6	Verizon-17 Corporate technology and
7	215-639-0801	7	network functional
8	cburke@karpf-law.com	8	capabilities
9	-- Counsel for Plaintiff	9	
10		10	
11	REED SMITH, LLP	11	
12	BY: JOEL S. BARRAS, ESQUIRE	12	
13	2500 One Liberty Place	13	
14	Philadelphia, Pennsylvania 19103	14	
15	215-851-8100	15	
16	jbarras@reedsmith.com	16	
17	-- Counsel for Defendant	17	
18		18	
19		19	
20		20	
21		21	
22		22	
23		23	
24		24	

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email: rkreporting@gmail.com

BRIAN MAGEE

Pages 5 to 8

<p style="text-align: right;">Page 5</p> <p>1 (It is stipulated and agreed by 2 and between counsel for the respective parties 3 that the reading, signing, sealing, 4 certification and filing of the within 5 deposition be waived; and that all objections, 6 except as to the form of the question, be 7 reserved until the time of trial.) 8 ----- 9 BRIAN MAGEE, after having 10 been first duly sworn, was examined and 11 testified as follows: 12 ----- 13 EXAMINATION 14 ----- 15 BY MS. BURKE: 16 Q. I know I introduced myself off the 17 record, but just to put everything on record. 18 Again, my name is Christine Burke and I 19 represent Suzette Walker in a civil lawsuit 20 that she has brought against Verizon, her 21 former employer, and I am here to take your 22 deposition today. 23 For instruction purposes, have you ever 24 been deposed before?</p>	<p style="text-align: right;">Page 7</p> <p>1 your recollection? 2 A. No. 3 Q. I say the best of your recollection, 4 because the purpose of the deposition is not to 5 trick you. If the answer to your question is 6 that you don't know because you never did know, 7 then you can tell me that you don't know the 8 answer, okay, but if you can't remember 9 something, you can also tell me you can't 10 remember. I don't want you to guess or 11 speculate about things that you have no 12 knowledge of, okay? 13 A. Okay. 14 Q. And I am sure your counsel will agree 15 with me. Your counsel is entitled to and is 16 probably going to make objections during the 17 course of the deposition. If you hear him make 18 an objection, then you just stop testifying at 19 that point because our court reporter can only 20 type down what one person is saying at one 21 time. That way he can say why he takes issue 22 with my question and then he and I will work it 23 out. Most likely you will be able to answer 24 all my questions, but for some reason he may</p>
<p style="text-align: right;">Page 6</p> <p>1 A. One other time, 15, 20 years ago. 2 Q. Was it in connection with your 3 employment at Verizon? 4 A. No. 5 Q. For a personal nature? 6 A. Uh-huh, yes. 7 Q. So that is the first instruction I will 8 give you, because it is important. No matter 9 what your response is, just make sure that you 10 keep it verbal. If you say uh-huh to me during 11 the course of the deposition, I know what you 12 are saying, but then when your attorney and I 13 read the dep at a later date we may argue over 14 what your response was, okay? 15 A. Okay. 16 Q. So no matter what, just make sure that 17 you verbalize any responses. Even though we 18 are sitting here in a conference room setting, 19 do you understand the deposition is under oath 20 and this is a formal court proceeding? 21 A. Yes, I do. 22 Q. Is there any reason today at all that 23 you believe you may not be able to give 24 truthful and accurate testimony to the best of</p>	<p style="text-align: right;">Page 8</p> <p>1 not want you to answer a question, okay? 2 A. Okay. 3 Q. If you don't understand one of my 4 questions, it is confusing to you, you are not 5 sure what it is that I am asking, you would 6 like me to repeat it or clarify, I would like 7 you to let me know that you don't know what it 8 is that I am asking or you don't understand, 9 okay? 10 A. Okay. 11 Q. If you need, unfortunately your dep may 12 be a little longer than normal witness 13 depositions because of all the documents, but 14 if you need a break at some point then just let 15 me know that, and you can take a break at any 16 time. If you need to take a phone call or 17 whatever the case may be, but if I ask a 18 particular question, I ask that you answer that 19 before you leave the room, okay? 20 A. Okay. 21 Q. Other than any communications that you 22 may have had with your counsel, did you 23 personally do anything to prepare for the 24 deposition today?</p>

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BRIAN MAGEE

Pages 9 to 12

<p style="text-align: right;">Page 9</p> <p>1 A. I reviewed just some, you know, what I, 2 the performance reviews from the last two 3 years. 4 Q. For who? 5 A. Suzette Walker. 6 Q. When you say the last two years, are 7 you referring to her 2014 and 2013 review? 8 A. Yes. 9 Q. You are currently employed with 10 Verizon, correct? 11 A. Correct. 12 Q. Is your title right now manager of 13 engineering? 14 A. Yes. 15 Q. How long have you held that title? 16 A. Since 2002. 17 (Whereupon Bates stamp Def Walker 18 106 was marked for identification as 19 Verizon-1.) 20 BY MS. BURKE: 21 Q. Mr. Magee, our court reporter just 22 handed you what we marked Verizon-1. For your 23 reference if you look at the bottom right-hand 24 corner of this document, any document that I</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. Joseph Snyder? 2 A. Snyder. Supervisor, could be a 3 vacancy, but, yeah, I see where it says 4 February. 5 Q. So do you believe sometime in either 6 early 2008 or late 2007 would be a fair 7 estimate of when you began supervising Suzette 8 Walker? 9 A. Yes. 10 Q. At any point prior to that time did you 11 have any supervisory responsibilities over Ms. 12 Walker? 13 A. No. 14 Q. For the entire period of time that you 15 have supervised her was she working out of the 16 900 Race Street location? 17 A. Yes. 18 Q. Now, during the course of discovery we 19 have been provided with two performance 20 evaluations for Ms. Walker, including her 2013 21 and 2014. Additional ones are forthcoming, but 22 since you started supervising Ms. Walker do you 23 believe you have been preparing formal 24 evaluations for her?</p>
<p style="text-align: right;">Page 10</p> <p>1 hand you today is going to have a Bates stamp 2 number on it, this one just for the record is 3 DEF Walker 106. So if you hear me refer to a 4 Bates stamp number to help you with these 5 documents that is what I will be talking about. 6 First of all, do you recognize this document? 7 A. I have never seen this document before. 8 Q. It is a document that was produced by 9 your counsel which appears to reflect various 10 job titles held by Suzette Walker since 2000. 11 So just take a moment to take a look at the job 12 titles, the identify of her salary, 13 supervisor/manager and her work location and 14 let me know when you are ready? 15 A. Okay, I am ready. 16 Q. So if you look at this document, it 17 indicates that you have been a supervisor or 18 manager of Ms. Walker beginning in or about 19 February of 2008. Do you see that? 20 A. Yes, I do. 21 Q. Do you believe that is accurate? 22 A. I would say probably the December 23 because the name next to December is a 24 director.</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Yes. 2 Q. Now, if you look at the entry for 3 December of 2012 there is a supervisor manager 4 listing there as Patricia McCoach. Do you see 5 that? 6 A. Yes. 7 Q. Do you know why that individual, if at 8 all, supervised Ms. Walker for that period of 9 time? 10 A. I don't recall. 11 Q. Was there a period of time at some 12 point in late 2012 that you did not oversee or 13 supervise Ms. Walker? 14 A. According to this, yes. 15 Q. Do you have any independent 16 recollection of that? 17 A. I do not. 18 Q. During the course of time that Ms. 19 Walker transitioned from supervisor network 20 engineering to section manager how did the 21 nature of her job responsibilities change? 22 A. I don't think it changed. 23 Q. Is it just a change in title only? 24 A. I believe it is a title only change.</p>

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BRIAN MAGEE

Pages 13 to 16

Page 13	Page 15
<p>1 Q. When she transitioned to specialist 2 network engineering did the nature and function 3 of her job duties change? 4 A. Yes. 5 Q. How did they change? 6 A. She would no longer have been in charge 7 of associates, she wouldn't have been in a 8 supervisor role, she would have been in a 9 direct responsibility role. 10 Q. When she changed title to Engineering 11 III Specialist how did the nature and function 12 of her job duties change, if at all? 13 A. The specialist to the Engineer III was 14 just a title change. 15 (Whereupon employee rating form was 16 marked for identification as 17 Verizon-2.) 18 BY MS. BURKE: 19 Q. Mr. Magee, you can keep Verizon-1 in 20 front of you now because I will ask you a 21 question about it after you had an opportunity 22 to look at something in this packet, but you 23 have just been provided with Verizon-2, which 24 is a list of rate and rank employees under your</p>	<p>1 A. I completed portions of this document 2 during the, what we call the RIF period, 3 evaluating, you know, the employees. 4 Q. Was it in this same format that we see 5 here or were you completing it in a different 6 format? 7 A. I had the table, I would say. 8 Q. Did the table have the same categories 9 that we see here including name, job title, 10 band, all the way through whether they were 11 going to be impacted or remained employed? 12 A. I don't recall the final column. 13 Q. The final column? 14 A. Yeah, I don't recall that. 15 Q. When you say you were inputting the 16 information, were you inputting the numerical 17 scores for performance based categories? 18 A. The performance one, I guess. Which 19 columns are you referring to? 20 Q. Any of these numbers. So let's just 21 use Scott Panichelli as an example. The 22 numbers 3 all the way through the total score, 23 did you input those numerical scores? 24 A. I did not input all of them.</p>
Page 14	Page 16
<p>1 direct supervision. Take a moment to look at 2 this document, including just the first four 3 pages for now. First of all, do you recognize 4 those first four pages? 5 A. I saw this for the first time yesterday 6 at the counsel's office. 7 Q. Having the opportunity to take a look 8 at it right now, the first four pages, do you 9 believe it reflects the names of various 10 employees that are under your direct 11 supervision? 12 A. Yes. 13 Q. Including additional information about 14 their performance, right? 15 A. Yes. 16 Q. If you look at the last two pages of 17 this document, first let me know if you 18 recognize those final two pages? 19 A. Yes, I do. 20 Q. Did you see this for the first time 21 yesterday as well? 22 A. No. 23 Q. When was the first time that you saw 24 this document?</p>	<p>1 Q. Which ones were you responsible for 2 inputting? 3 A. The third, fourth, fifth, sixth, 4 seventh and eighth of the numbered sequence. 5 MR. BARRAS: Can we just read off 6 the titles so there is no confusion? 7 MS. BURKE: Yeah. 8 BY MS. BURKE: 9 Q. So is it fair to say that respecting 10 the 2014 and 2015 performance entry, does that 11 number directly correlate with the score that 12 they received on their formal performance 13 evaluation? 14 A. The 2014 and the 2015? 15 Q. Yes. 16 A. What I would say is yes, that is how I 17 see the correlation. 18 MR. BARRAS: Can we first clarify 19 which columns -- 20 MS. BURKE: Yes. 21 MR. BARRAS: -- he filled out? 22 BY MS. BURKE: 23 Q. First of all, before we do that, your 24 understanding of 2014 PERF and 2015 PERF, that</p>

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BRIAN MAGEE

Pages 17 to 20

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<p>1 those categories reflect numbers which would be</p> <p>2 obtained from their performance evaluation,</p> <p>3 whether they were leading, performing or</p> <p>4 developing?</p> <p>5 A. Yes.</p> <p>6 Q. Can we mark this?</p> <p>7 (Whereupon rate and rank scoring</p> <p>8 criteria was marked for identification</p> <p>9 as Verizon-3.)</p> <p>10 BY MS. BURKE:</p> <p>11 Q. Mr. Magee, if you take a look at is,</p> <p>12 Verizon-3.</p> <p>13 MR. BARRAS: I'm sorry, you asked</p> <p>14 him earlier which columns he filled</p> <p>15 out, he answered the columns 3 through</p> <p>16 8. Can we identify what column is 3</p> <p>17 and what column is 8?</p> <p>18 MS. BURKE: That is fine, I was</p> <p>19 going to go back to it and go through</p> <p>20 each column at a time, but.</p> <p>21 BY MS. BURKE:</p> <p>22 Q. Your counsel wants clarification. Out</p> <p>23 of these columns starting with 2014 PERF and</p> <p>24 underneath, and right now we are just using</p>	<p>1 that I am looking at, and the totals would be</p> <p>2 added up of all.</p> <p>3 Q. Did you do that, total them?</p> <p>4 A. No, I think the system did it.</p> <p>5 Q. Looking at the categories where it says</p> <p>6 2014 and 2015 PERF for performance, I handed</p> <p>7 you Verizon-3, can you take a look at Verizon-3</p> <p>8 and let me know if you recognize that document?</p> <p>9 A. Yes, I have seen this before.</p> <p>10 Q. Now, this says performance rating 2013</p> <p>11 and performance rating 2014. Is those the two</p> <p>12 years that you used to assess formal</p> <p>13 performance reviews for the RIF?</p> <p>14 A. Yes.</p> <p>15 Q. If someone was leaving would you have</p> <p>16 placed a 5 in the category next to that</p> <p>17 person's name for that particular year?</p> <p>18 A. Yes.</p> <p>19 Q. If you look at the second page, it is</p> <p>20 the last page of Exhibit 2, you see Paul</p> <p>21 Klauss?</p> <p>22 A. Yes.</p> <p>23 Q. He was one of the few people that got a</p> <p>24 5, right?</p>
Page 18	Page 20
<p>1 Scott Panichelli as an example. Did you input</p> <p>2 that number there?</p> <p>3 A. Repeat what you said.</p> <p>4 Q. Just using Scott Panichelli as an</p> <p>5 example, where it says 2014 PERF, did you input</p> <p>6 that 3 there?</p> <p>7 A. Not directly.</p> <p>8 Q. What about 2015 PERF?</p> <p>9 A. Not directly.</p> <p>10 Q. Primary skill?</p> <p>11 A. Yes.</p> <p>12 Q. Technical knowledge?</p> <p>13 A. Yes.</p> <p>14 Q. And Credo?</p> <p>15 A. Yes.</p> <p>16 Q. Others?</p> <p>17 A. Yes.</p> <p>18 Q. And corrective action?</p> <p>19 A. I don't recall filling that in. There</p> <p>20 is all zeros in it.</p> <p>21 Q. That just reflects whether or not they</p> <p>22 had any on their file, right?</p> <p>23 A. Right. It might have been automated,</p> <p>24 HR might have, I don't recall that line now</p>	<p>1 A. Yes.</p> <p>2 Q. Five reflects that he received a score</p> <p>3 of leading on his performance evaluation,</p> <p>4 correct?</p> <p>5 A. Yes.</p> <p>6 Q. Now, even though this category, and we</p> <p>7 are looking at the document Bates stamp DEF</p> <p>8 Walker 22, are you still with me on that page?</p> <p>9 A. Yes.</p> <p>10 Q. This says 2014 PERF and 2015 PERF. Do</p> <p>11 you believe that is accurate, that that is</p> <p>12 where those scores came from?</p> <p>13 MR. BARRAS: Object just on the</p> <p>14 basis that he testified he did not</p> <p>15 complete these columns. You can</p> <p>16 answer.</p> <p>17 BY MS. BURKE:</p> <p>18 Q. Do you believe that is accurate?</p> <p>19 A. I guess -- no, in what it is doing, no.</p> <p>20 Q. You would agree with me that in</p> <p>21 assessing these particular employees and</p> <p>22 gauging their performance you went based off of</p> <p>23 annual year 2013 and 2014?</p> <p>24 A. Yes. And I guess just the way I am</p>

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<p>1 looking at this, because we do the performance</p> <p>2 appraisals for 2013, we complete them in 2014,</p> <p>3 and we complete the 2014 complete in 2015.</p> <p>4 Q. Right, but just so the record is clear.</p> <p>5 A. For the calendar year 2013 and 2014 is</p> <p>6 what I used.</p> <p>7 Q. Because at or about the time that Ms.</p> <p>8 Walker was RIF'd in or about April of 2015 she</p> <p>9 had not had her performance assessed for 2015</p> <p>10 in any formal way, correct?</p> <p>11 A. Correct.</p> <p>12 Q. The only evaluations that you reviewed</p> <p>13 before coming here were for calendar year 2013</p> <p>14 and 2014, right?</p> <p>15 A. Performance reviews, yes, 2013 and</p> <p>16 2014.</p> <p>17 Q. The reason why I gave you Verizon-2 in</p> <p>18 the first instance I wanted to seek</p> <p>19 clarification on something. In the last two</p> <p>20 pages of this document, are you still on Bates</p> <p>21 stamp 22?</p> <p>22 A. Yes, I am.</p> <p>23 Q. Where it identifies job entry date, do</p> <p>24 you see that?</p>	<p>1 before May of 2014?</p> <p>2 A. No.</p> <p>3 Q. See Anthony Portolese?</p> <p>4 A. Yes.</p> <p>5 Q. Job entry date April 2014?</p> <p>6 A. Yes.</p> <p>7 Q. Do you know what that reflects?</p> <p>8 A. It must have been when Anthony came</p> <p>9 back to engineering.</p> <p>10 Q. Where did he come from?</p> <p>11 A. He was a supervisor.</p> <p>12 Q. In the engineering department or</p> <p>13 elsewhere?</p> <p>14 A. No, elsewhere.</p> <p>15 Q. At a different location than 900 Race</p> <p>16 Street?</p> <p>17 A. Yes.</p> <p>18 Q. Was he under your direct supervision</p> <p>19 immediately preceding 4/27/14?</p> <p>20 A. No.</p> <p>21 Q. Can you just take a moment to look at</p> <p>22 your group of individuals and tell me if anyone</p> <p>23 else besides David Perry or Anthony Portolese</p> <p>24 was not under your supervision before their job</p>
Page 22	Page 24
<p>1 A. Yes.</p> <p>2 Q. Do you know what that reflects?</p> <p>3 A. No.</p> <p>4 Q. The first exhibit that I gave you,</p> <p>5 Verizon-1, the spreadsheet that I gave you, the</p> <p>6 first one, if you look there and you check on</p> <p>7 the 12/9/12 date that is identified for Ms.</p> <p>8 Walker, was there some type of change or</p> <p>9 department or anything that transpired in</p> <p>10 December 2012 that you are aware?</p> <p>11 A. That would have been when she was</p> <p>12 changed from being a supervisor to a</p> <p>13 specialist, which now is called engineer. So</p> <p>14 following this that is what I would see.</p> <p>15 Q. Some of the job entry dates, which are</p> <p>16 more recent than Ms. Walker's, and I will just</p> <p>17 use David Perry as an example, if you go to the</p> <p>18 last page of Verizon Exhibit 2, the packet.</p> <p>19 You see David Perry's entry date, May 25, 2014?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know what that reflects?</p> <p>22 A. He also changed from a supervisor to an</p> <p>23 engineer.</p> <p>24 Q. Had he been under your supervision</p>	<p>1 entry date? Do you want me to go through them</p> <p>2 with you one by one?</p> <p>3 A. Sure, if you like. I'm sorry, I am</p> <p>4 just thinking of Anthony, the 4/27, he did</p> <p>5 change from a supervisor to an engineer that</p> <p>6 date, that is just something that is not</p> <p>7 striking me right with that April date.</p> <p>8 Q. You don't believe that is an accurate</p> <p>9 reflection of his job entry date under your</p> <p>10 supervision at the 900 Race Street location?</p> <p>11 A. Correct.</p> <p>12 Q. Was there something else you were going</p> <p>13 to say?</p> <p>14 A. No, that date just kind of stuck in my</p> <p>15 head. The month doesn't look right.</p> <p>16 Q. What month would you believe would be</p> <p>17 more accurate?</p> <p>18 A. I thought he came earlier in that year.</p> <p>19 Q. Looking at the other individuals in the</p> <p>20 list, let's look at the first page, Scott</p> <p>21 Panichelli, do you see his job entry date of</p> <p>22 March 4, 2012?</p> <p>23 A. Yes.</p> <p>24 Q. Was he under your supervision prior to</p>

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<p style="text-align: right;">Page 25</p> <p>1 that?</p> <p>2 A. Directly before, no.</p> <p>3 Q. Do you have any knowledge or</p> <p>4 understanding of what the job entry date</p> <p>5 reflects for Scott Panichelli?</p> <p>6 A. These dates don't reflect when they</p> <p>7 were assigned to me.</p> <p>8 Q. Do you have any idea what they reflect?</p> <p>9 A. When their title seems like, yeah, I am</p> <p>10 not finding a good correlation because I am</p> <p>11 just looking at different ones. Like Joe Hui,</p> <p>12 Steve Murphy, I can't tell you what that job</p> <p>13 entry date was referring to, sorry.</p> <p>14 Q. Was there some type of transition of</p> <p>15 job duties for your engineers in your</p> <p>16 department in or about 2013 because of Fios or</p> <p>17 high band.</p> <p>18 A. No. I don't understand the question.</p> <p>19 Q. Was there a reason why any of your</p> <p>20 engineers changed from supervisors to</p> <p>21 specialists?</p> <p>22 A. There was movement, all movement of</p> <p>23 people associated with a downsizing, a RIF,</p> <p>24 that I can see.</p>	<p style="text-align: right;">Page 27</p> <p>1 2013?</p> <p>2 A. Yes.</p> <p>3 Q. Before we move on to the RIF, so as the</p> <p>4 manager of engineering you are responsible for</p> <p>5 a team of engineers?</p> <p>6 A. Yes.</p> <p>7 Q. How long has that been true for?</p> <p>8 A. Since approximately 2002.</p> <p>9 Q. What job function did you have with</p> <p>10 Verizon immediately preceding 2002?</p> <p>11 A. I was a supervisor of drafters.</p> <p>12 Q. Were you promoted?</p> <p>13 A. Yes.</p> <p>14 Q. The 15 individuals identified as being</p> <p>15 on your team, at least as of the time that they</p> <p>16 were rated and ranked for the RIF that occurred</p> <p>17 in or about April of 2015, has that number of</p> <p>18 individuals on your team remained fairly</p> <p>19 consistent since you were promoted to manager</p> <p>20 of engineering?</p> <p>21 A. Since 2002?</p> <p>22 Q. Yeah.</p> <p>23 A. No.</p> <p>24 Q. How has that changed, did your team</p>
<p style="text-align: right;">Page 26</p> <p>1 Q. So when Ms. Walker changed from a</p> <p>2 supervisor to a specialist, at least based on</p> <p>3 Verizon-1, that occurred sometime in 2012. Do</p> <p>4 you know why that happened?</p> <p>5 A. I think it was a consolidation of</p> <p>6 functions, and she was a supervisor, I think</p> <p>7 there wasn't enough people for her to</p> <p>8 supervise.</p> <p>9 Q. So instead of supervising various</p> <p>10 individuals did she take on the task they were</p> <p>11 performing herself?</p> <p>12 A. No, she became an engineer with a</p> <p>13 separate responsibility from supervision.</p> <p>14 Q. In reviewing all of the performance</p> <p>15 evaluations can we call it your team, is that</p> <p>16 fair?</p> <p>17 A. Yes.</p> <p>18 Q. For your team, for 2013 and 2014, I</p> <p>19 noticed that the FAC verification and the SR</p> <p>20 numbers only appear in the 2014 evaluations.</p> <p>21 Do you know why that is?</p> <p>22 A. It could have been availability of a</p> <p>23 report that came out then.</p> <p>24 Q. Were those numbers being monitored in</p>	<p style="text-align: right;">Page 28</p> <p>1 grow over the years?</p> <p>2 A. There has been a lot of changes to my</p> <p>3 team, grew, responsibility increased, and I</p> <p>4 would get additional people with that</p> <p>5 responsibility.</p> <p>6 Q. Is it Joseph Muccilo, is that how you</p> <p>7 say it?</p> <p>8 A. Muccilo.</p> <p>9 Q. He is your direct supervisor, correct?</p> <p>10 A. He is my director, yes.</p> <p>11 Q. Has he been your supervisor since in or</p> <p>12 about 2002?</p> <p>13 A. No.</p> <p>14 Q. Or were you reporting to someone else?</p> <p>15 A. I reported to three other directors.</p> <p>16 Q. In the interim?</p> <p>17 A. Yes.</p> <p>18 Q. When did you start reporting to Joe?</p> <p>19 A. Approximately two years ago.</p> <p>20 (Whereupon organization list was</p> <p>21 marked for identification as</p> <p>22 Verizon-4.)</p> <p>23 BY MS. BURKE:</p> <p>24 Q. Mr. Magee, I am handing you what has</p>

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<p>1 been marked Verizon Exhibit 4. First of all,</p> <p>2 take a look at this, let me know if you</p> <p>3 recognize it?</p> <p>4 A. Yes.</p> <p>5 Q. What is this?</p> <p>6 A. This is a form that I created just to</p> <p>7 share responsibilities of my team and their</p> <p>8 contact numbers.</p> <p>9 Q. You have team members both in Delaware</p> <p>10 and in Pennsylvania, correct?</p> <p>11 A. Yes.</p> <p>12 Q. Do you have anyone in Maryland?</p> <p>13 A. No.</p> <p>14 Q. Is it fair your team members are</p> <p>15 assigned various territories?</p> <p>16 A. Yes, we call them turf.</p> <p>17 Q. Using Suzette Walker as an example, who</p> <p>18 is at the bottom of the second page of this</p> <p>19 document, do you know when she was assigned her</p> <p>20 particular turf?</p> <p>21 A. At the beginning of 2014.</p> <p>22 Q. Were all turf assignments made</p> <p>23 beginning of 2014?</p> <p>24 A. No.</p>	<p>1 a cable from 5th Street to 6th Street I would</p> <p>2 utilize the conduit.</p> <p>3 So any construction that is happening</p> <p>4 could interfere with our conduit, so you would</p> <p>5 have to answer that request, respond to</p> <p>6 requests either for growth of conduit, repair</p> <p>7 of conduit or move of conduit. It also entails</p> <p>8 the leasing of our conduit to third party</p> <p>9 providers.</p> <p>10 Q. You said leasing, right?</p> <p>11 A. Yes.</p> <p>12 Q. Do you know how long she worked in the</p> <p>13 position handling conduit responsibilities?</p> <p>14 A. A little over a year.</p> <p>15 Q. So maybe late 2012 she started in that</p> <p>16 role?</p> <p>17 A. I believe so.</p> <p>18 Q. If you look at Verizon-1. Even though</p> <p>19 it only reflects when titles change, if you</p> <p>20 look at 12/9/2012, does that seem about right</p> <p>21 when she started to take on the conduit role?</p> <p>22 A. Yes.</p> <p>23 Q. Then you identified that sometime</p> <p>24 beginning in 2014 you moved her so she had a</p>
Page 30	Page 32
<p>1 Q. How did it come to be that Suzette</p> <p>2 Walker obtained these particular turfs</p> <p>3 beginning 2014?</p> <p>4 A. Moved her from one position to another.</p> <p>5 Her responsibility changed and assigned her a</p> <p>6 turf.</p> <p>7 Q. What position was she moved from and</p> <p>8 to?</p> <p>9 A. She worked in the conduit department.</p> <p>10 Q. She moved from the conduit department</p> <p>11 to a different?</p> <p>12 A. To a turf position.</p> <p>13 Q. Whether she was working in conduit or</p> <p>14 then moved to turf, was she still considered an</p> <p>15 engineering specialist at that point?</p> <p>16 A. Yes.</p> <p>17 Q. Could you describe for me what her job</p> <p>18 responsibilities generally were while she was</p> <p>19 working in the conduit position?</p> <p>20 A. The conduit highway, so the</p> <p>21 responsibility is to, I guess, deploy, repair,</p> <p>22 answer any requests for use of our underground</p> <p>23 conduit. Conduit is used to -- has a medium</p> <p>24 for our cables to go in. So if you need to get</p>	<p>1 turf, right?</p> <p>2 A. Correct.</p> <p>3 Q. Before I move off of her job duties</p> <p>4 respecting conduits, was she handling</p> <p>5 residential customers, commercial customers or</p> <p>6 both?</p> <p>7 A. In which role?</p> <p>8 Q. Conduit.</p> <p>9 A. Both.</p> <p>10 Q. So if a homeowner had an issue and</p> <p>11 there was damage to a line or something, they</p> <p>12 might make a call?</p> <p>13 A. It could, but that wasn't the norm. It</p> <p>14 would be more conduit pathway to feed a block</p> <p>15 or feed, you know, a business.</p> <p>16 Q. Did she actually have to leave the</p> <p>17 office to make site visits when she was working</p> <p>18 in the conduit role?</p> <p>19 A. That would be a responsibility, yes.</p> <p>20 Q. Did she have the ability to work with</p> <p>21 any contractors to also go out to these sites</p> <p>22 and handle any of the functions associated with</p> <p>23 her conduit role?</p> <p>24 A. Yes.</p>

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<p style="text-align: right;">Page 33</p> <p>1 Q. Were they employed by Verizon or were 2 they independent contractors? 3 A. They work for a, usually a payroll 4 company. 5 Q. Do you call them contractors? 6 A. Yes. If it is on site it would be an 7 on-site contractor. 8 Q. Are you familiar with employees that 9 have the title drafters or vocational 10 employees? 11 A. Yes. 12 Q. Did Ms. Walker use those types of 13 employees to assist her when she performed 14 conduit job functions? 15 A. She could. 16 Q. Did the position of drafters or 17 vocational employees, did they start to get 18 eliminated slowly? 19 A. They were eliminated just by offer, 20 they wouldn't be -- new drafters weren't being 21 created, so attrition. 22 Q. Are you familiar with the term 23 assignment technicians? 24 A. Yes.</p>	<p style="text-align: right;">Page 35</p> <p>1 Q. What is the difference between an off 2 site and an on-site contractor? 3 A. On site works usually for a payroll 4 company and is in the office using our 5 computers, interacting directly with the other 6 Verizon employees. 7 Off site is rarely, if ever, in an 8 office, a Verizon office. They receive their 9 work via their employer, who the engineer sends 10 work to their employer and their employer 11 assigns the person to do the work. 12 Q. So would Ms. Walker have worked with 13 Jerry Rogers, for example, when she was doing 14 conduit job duties or is that more so once she 15 was assigned a turf? 16 A. She shouldn't really when she was the 17 conduit, like there would be no reason. Jerry 18 Rogers should have been interacting with the 19 engineer. The engineer would interact with 20 Suzette in the conduit position, but in the 21 engineer role she would be assigning work to a 22 company, and Jerry Rogers could be the person 23 who did that work and then would feed work back 24 to Suzette.</p>
<p style="text-align: right;">Page 34</p> <p>1 Q. Was Ms. Walker dealing with assignment 2 technicians while she was handling conduit 3 responsibilities? 4 A. I don't see any need for conduit 5 position interact with assignment technician. 6 Q. What about when she transitioned to 7 turf? 8 A. You could interact with assignment 9 technician, but she was not over top of an 10 assignment technician. 11 Q. What were the assignment technicians 12 utilized for? 13 A. Primary function of assignment 14 technician was to work in our assignment 15 systems with the copper network to assign 16 customer addresses to term roles and facilities 17 so that service orders, customer service orders 18 could flow through. 19 Q. So did they work within the office? 20 A. They are primary office workers. 21 Q. I am just using this as an example, 22 Jerry Rogers was he a contractor that Ms. 23 Walker worked with? 24 A. He was an off-site contractor.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. It would be handled on Verizon's end? 2 A. Correct. 3 Q. Do you know the name of the company 4 that he worked for? 5 A. The company that he worked for now is 6 called Cyneint. 7 Q. How do you spell that? 8 A. C-Y-N, I think it is E-I-N-T. 9 Q. Oh Cyneint? 10 A. Yes. But they have changed names. I 11 don't know what their name was in the '13, '14 12 year. 13 Q. Who is handling Ms. Walker's turf now 14 that she is no longer employed with Verizon? 15 A. Split between two people. 16 Q. Who is handling it? 17 A. Anthony Portolese handles Baldwin and 18 Poplar COs and Joe Scelsa handles the Chestnut 19 Hill, Davenport, Germantown and Ivy Ridge and 20 Waverly COs. 21 Q. How do you determine how that turf 22 would be split up between those two 23 individuals? 24 A. I look at, you know, what it entails,</p>

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<p>1 what it can handle, I make the decision based 2 upon what I know of the areas. 3 Q. Once you gave Mr. Portolese Baldwin and 4 Poplar, did he continue to perform conduit 5 highway work? 6 A. Yes, he did. 7 Q. So is he doing both? 8 A. Yes. 9 Q. Is Joe still handling the entire turf 10 from Ardmore to Glenolden? 11 A. He is handling besides the Philadelphia 12 offices he is handling Ardmore and Bala Cynwyd. 13 Q. Who obtained Kirkland down to 14 Glenolden? 15 A. I split those between Paul Klauss and 16 Ernie Padovani. 17 Q. Which ones did Paul Klauss get? 18 A. Larchmont, and the others were all in 19 Delaware County, so they all went to Ernie 20 Padovani who now has, covers Delaware County. 21 Q. Are Talleyville and Holly Oak in 22 Delaware County? 23 A. No, they are Delaware. This front one 24 doesn't match the same date from the back one.</p>	<p>1 Q. You described for me what Ms. Walker's 2 job responsibilities were when she was handling 3 conduit job duties, do you recall that 4 testimony? 5 A. Yes. 6 Q. Then we talked about how she was 7 assigned a turf in early 2014. Can you explain 8 what the nature of her job functions were once 9 she was assigned a turf? 10 A. Yes. She was responsible in the turf 11 for all residential and business requests for 12 service, whether it be new service or requests 13 for changes to our, you know, facilities, and 14 all customer interactions. 15 Q. For that turf? 16 A. For that turf. 17 Q. Did each turf correlate with some 18 larger clients like SEPTA or the City of 19 Philadelphia or did everybody have a hand in 20 those clients? 21 A. Some, there is only one international 22 airport in Philadelphia, so that is only in one 23 person's turf. 24 Q. Give me an example, who has that, what</p>
Page 38	Page 40
<p>1 Q. Oh, okay. 2 A. The COs, in the front, from in July of 3 2014 if we are looking at that, that is now how 4 the other COs are in July 2014. 5 Q. When you use the term CO, what do you 6 mean? 7 A. Each one of those names equates to a 8 central office at Verizon. Central office is 9 where our switch is. 10 Q. So if we look at page 1, which appears 11 to have a date of January 2014, do you know 12 when Ms. Walker obtained a turf, since you said 13 it was the beginning of 2014, did she not get 14 her turf until July? 15 A. No, she would have gotten her turf in 16 the beginning of 2014. 17 Q. Do you maintain monthly lists similar 18 to what is contained in exhibit Verizon-4? 19 A. I make a change when something -- when 20 there is a change to the person or the turf. 21 Q. So do you have a current one then that 22 would reflect, for example, that Portolese's 23 handling Baldwin and Poplar now? 24 A. Yes.</p>	<p>1 turf is that? 2 A. In 2014 Steve Murphy. So SEPTA is in 3 numerous turfs, they have offices, City of 4 Philadelphia has numerous offices across, so. 5 Q. So every day the number of inquiries 6 that you get from perspective clients changes 7 or current or existing clients changes, right? 8 A. I don't understand your question, I am 9 sorry. 10 Q. If someone wants something installed do 11 you call it a work order? 12 A. A work order would equate. It is not 13 just -- so a work order would be when the 14 engineer needs construction to do work. We 15 write a work order and that is how they perform 16 the work, construction or contract services. 17 Q. How are these engineers responsible for 18 implementing a design? 19 A. They would take in the information of 20 what the request is, they would gather the 21 information, reviewing records, field survey, 22 customer interaction, our record systems, and 23 then devise the answer to whatever the request 24 was.</p>

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<p>1 Q. The job responsibilities that you 2 identified that Ms. Walker was responsible for 3 when she was assigned a turf, did that remain 4 consistent throughout the duration of her 5 employment? 6 A. Yes. 7 Q. So from the time that she was assigned 8 a turf in early 2014 to when her position was 9 eliminated her job duties were fairly 10 consistent? 11 A. Yes. 12 Q. In terms of what she was responsible 13 for? 14 A. Yes. 15 Q. In order to take on the 16 responsibilities assigned with handling a turf, 17 was there any kind of required training or were 18 they supposed to have a working base knowledge 19 in order to do that, was it assumed? 20 A. There would be -- training would be any 21 system, there would be on-the-job training with 22 assistance. When we role out a new system we 23 usually have an online training system of it, 24 you know, everyone logs into the account and</p>	<p>1 A. Yes. 2 Q. This format, how long has Verizon been 3 implementing or issuing these types of 4 evaluations to employees, has it been the same 5 format since you took your promotion in 2002 or 6 is this? 7 A. Very similar format. The systems have 8 changed and went from like paper based to 9 electronic. Fairly similar. 10 Q. Before we get into her evaluations, so 11 I am going to get into these with you because 12 they are the only ones that I currently have, 13 but I didn't see any actual corrective action 14 notices or discipline in any of the documents 15 provided for Ms. Walker. Did you ever issue 16 her any kind of corrective action notices or 17 discipline? 18 A. No. 19 Q. Was it because you didn't think they 20 were warranted or no basis to issue discipline? 21 A. No basis to issue discipline. 22 Q. If, in fact, an employee is suffering 23 from a performance standpoint, does Verizon 24 have any tools that it may utilize, its</p>
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<p>1 watches an instructor do it. 2 We have vendors that come in with new 3 equipment, explain the equipment, we have a 4 knowledge on the web that any material you can 5 search onto, you know, to learn about the 6 network. 7 Q. Just so I understand, when she was 8 assigned a turf, it wasn't as though she was in 9 some kind of initial training introductory 10 period, she just received training as it was 11 necessary or available on the job? 12 A. Correct. 13 Q. Was that the same with respect to 14 anybody who was assigned a turf on your team? 15 A. Yes. 16 (Whereupon 2013 and 2014 17 performance reviews were marked for 18 identification as Verizon-5 and 6.) 19 BY MS. BURKE: 20 Q. Mr. Magee, let's look at the 2013 21 performance evaluation first, okay, we have 22 marked as Verizon-5, and also the 2014 one we 23 marked Verizon-6. Are these the evaluations 24 you reviewed today before coming here?</p>	<p>1 supervisors I mean, to coach employees 2 including performance improvement plan, 3 anything of that sort? 4 A. Yes. 5 Q. Is it called a performance improvement 6 plan or do you call it something else? 7 A. Performance improvement plan to the 8 best of my knowledge is what it is still 9 called. 10 Q. Have you ever had the opportunity to 11 utilize that tool at Verizon? 12 A. I have not. 13 Q. How did you know about it then? 14 A. Through our HR training. 15 Q. Other than using the actual performance 16 review to give feedback to your team what other 17 method or manner do you give feedback to your 18 team members regarding their performance, 19 whether it is positive or negative? 20 A. Usually one-on-one interaction. 21 Q. Verbal coaching? 22 A. Verbal. 23 Q. If it is not the time of year that an 24 actual formal performance evaluation is to be</p>

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<p>1 completed and you need to document the</p> <p>2 performance in some way, how do you do that?</p> <p>3 A. I don't.</p> <p>4 Q. Do you keep any files on your team</p> <p>5 members, personal notes of your own to log any</p> <p>6 concerns that you have, anything?</p> <p>7 A. No.</p> <p>8 Q. So other than the typewritten</p> <p>9 information that is actually contained in their</p> <p>10 performance evaluations do you personally</p> <p>11 create any other documents at all that would</p> <p>12 memorialize how they are doing or any concerns</p> <p>13 that you have?</p> <p>14 A. I don't create any, no.</p> <p>15 Q. Are you aware of anyone else at Verizon</p> <p>16 who does?</p> <p>17 A. I am not.</p> <p>18 Q. Before you issue your performance</p> <p>19 evaluations to your team members does Mr.</p> <p>20 Muccilo review them or do you have authority to</p> <p>21 do that without him?</p> <p>22 A. Before they are reviewed I have the</p> <p>23 freedom to do that.</p> <p>24 Q. Do you, in fact, review the performance</p>	<p>1 Q. I have seen the reviews that you issued</p> <p>2 for your team, at least from 2013 to 2015, you</p> <p>3 don't give out leading very often, is that</p> <p>4 fair?</p> <p>5 A. That's fair.</p> <p>6 Q. Only when you believe they are truly</p> <p>7 warranted?</p> <p>8 A. Yes.</p> <p>9 Q. Prior to issuing a developing to Ms.</p> <p>10 Walker for this 2013 evaluation had you ever</p> <p>11 given her a developing rating before?</p> <p>12 A. No.</p> <p>13 Q. This was the first time?</p> <p>14 A. Yes.</p> <p>15 Q. So if you look at the last page, these</p> <p>16 are electronic signatures, right?</p> <p>17 A. Yes.</p> <p>18 Q. They are both dated on the same day, is</p> <p>19 that at or about the time that you actually</p> <p>20 reviewed it with the employee?</p> <p>21 A. Yes.</p> <p>22 Q. So if you look at this review, you gave</p> <p>23 it to her in early February of 2014, correct?</p> <p>24 A. Correct.</p>
Page 46	Page 48
<p>1 evaluations with Mr. Muccilo before you give</p> <p>2 them to your team members?</p> <p>3 A. No.</p> <p>4 Q. Have you ever?</p> <p>5 A. No.</p> <p>6 Q. I am assuming there is a method where</p> <p>7 you can go into the computer and type in the</p> <p>8 comments that you think is appropriate for each</p> <p>9 individual's performance review?</p> <p>10 A. Yes.</p> <p>11 Q. The last page of Verizon-5, which is</p> <p>12 Ms. Walker's 2013 evaluation issued to her as</p> <p>13 you suggested earlier, it is first part of the</p> <p>14 next year, this leading, performing, developing</p> <p>15 and new, do you know how long that system had</p> <p>16 been in place or that you had utilized it for</p> <p>17 your team?</p> <p>18 A. I think it has always been there from</p> <p>19 the first time I did one, I think it has always</p> <p>20 been those ratings.</p> <p>21 Q. So from in or about the first time you</p> <p>22 started conducting performance evaluations?</p> <p>23 A. Or received one. I think I just</p> <p>24 remember those always being there.</p>	<p>1 Q. So that looking backwards for the</p> <p>2 entire year of her performance for calendar</p> <p>3 year 2013?</p> <p>4 A. Yes.</p> <p>5 Q. That is the way that it works. Do you</p> <p>6 recall how many months Ms. Walker was out of</p> <p>7 work for a medical leave in 2013?</p> <p>8 A. I don't know exactly, no.</p> <p>9 Q. Do you remember if she had some kind of</p> <p>10 shoulder injury of some sort?</p> <p>11 A. She did tell me she had a shoulder</p> <p>12 injury. That is not something we would</p> <p>13 typically know. She told me in passing one</p> <p>14 day.</p> <p>15 Q. Before or after she had the surgery?</p> <p>16 A. I am not sure if that was before or</p> <p>17 after.</p> <p>18 Q. I can get out documents if you want.</p> <p>19 Do you have any reason to disagree that she had</p> <p>20 her surgery on or about April 26, 2013?</p> <p>21 A. I don't have any reason to doubt.</p> <p>22 Q. A request for medical leave, whether</p> <p>23 they are covered by FMLA or short term</p> <p>24 disability, that is through a third party with</p>

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<p style="text-align: right;">Page 49</p> <p>1 Verizon; is that correct?</p> <p>2 A. Yes.</p> <p>3 Q. Do you believe that to be MetLife?</p> <p>4 A. Yes.</p> <p>5 Q. What type of notification or</p> <p>6 communication, if any, do you receive from</p> <p>7 MetLife in connection with employees' requests</p> <p>8 for approvals or denials of leave?</p> <p>9 A. Usually we will get an email saying</p> <p>10 this person has been approved for leave, and it</p> <p>11 gives the start and the end date.</p> <p>12 Q. I just want to establish some dates</p> <p>13 here since we are looking at 2013.</p> <p>14 (Whereupon letter dated May 16,</p> <p>15 2013 was marked for identification as</p> <p>16 Verizon-7.)</p> <p>17 BY MS. BURKE:</p> <p>18 Q. Mr. Magee, these are MetLife letters</p> <p>19 regarding requests for leaves that just reflect</p> <p>20 dates in terms of her request. So if you look</p> <p>21 at the first letter, it is dated May 16, 2013,</p> <p>22 but if you look in the first paragraph it</p> <p>23 identifies the leave beginning date is April</p> <p>24 26, 2013, and that she has been approved</p>	<p style="text-align: right;">Page 51</p> <p>1 contractor was that soaked up those</p> <p>2 responsibilities while she was out on leave?</p> <p>3 A. Gerry Slattery.</p> <p>4 Q. The whole time?</p> <p>5 A. I believe so.</p> <p>6 Q. Is he paid through payroll company?</p> <p>7 A. Yes.</p> <p>8 Q. Then if you look at the next notice.</p> <p>9 A. Gerry Slattery is no longer alive.</p> <p>10 Q. Oh, okay, thank you.</p> <p>11 A. Just in case, we tried to reach out to</p> <p>12 him.</p> <p>13 Q. If you look at the second letter in</p> <p>14 exhibit Verizon-7, it is dated June 6, 2013.</p> <p>15 It looks like she made an additional leave</p> <p>16 request which was approved to extend beyond the</p> <p>17 June 9th initial date, which was June 10th</p> <p>18 through July of 2013. Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recall that she continued to</p> <p>21 remain out of work through July of 2013?</p> <p>22 A. I have no reason to doubt that.</p> <p>23 Q. Then at some point thereafter what kind</p> <p>24 of discussion, if any, was there about her</p>
<p style="text-align: right;">Page 50</p> <p>1 through June of 2013. Do you see that?</p> <p>2 A. Yes.</p> <p>3 Q. Did you receive some kind of</p> <p>4 notification that she, in fact, been approved</p> <p>5 for leave through that period of time?</p> <p>6 A. I am sure I did, I don't recall.</p> <p>7 Q. Who, if anyone, was assigned to handle</p> <p>8 her conduit responsibilities while she was out</p> <p>9 of work from April through in or about June?</p> <p>10 A. The contractor. There was a contractor</p> <p>11 on site with her during that period, and he</p> <p>12 would have just assumed the whole</p> <p>13 responsibility.</p> <p>14 Q. What site are you referring to?</p> <p>15 A. 900 Race Street.</p> <p>16 Q. Oh, one of the on-site contractors?</p> <p>17 A. Yes.</p> <p>18 Q. So when you say assumed her conduit</p> <p>19 responsibility, for any number of calls that</p> <p>20 came in for a particular territory?</p> <p>21 A. For the City of Philadelphia. Her</p> <p>22 responsibility in conduit would be City of</p> <p>23 Philadelphia.</p> <p>24 Q. Do you remember who the on-site</p>	<p style="text-align: right;">Page 52</p> <p>1 returning to work with some kind of modified</p> <p>2 work hours?</p> <p>3 A. None that I know of.</p> <p>4 Q. Did you speak with any MetLife</p> <p>5 representatives by phone for any reason during</p> <p>6 the time that Ms. Walker was seeking leave from</p> <p>7 Verizon in 2013?</p> <p>8 A. No.</p> <p>9 Q. No, or you don't recall?</p> <p>10 A. No, I had no conversation. The only</p> <p>11 conversation that I would have had is they call</p> <p>12 in to verify the person returned to work, so it</p> <p>13 could have been, you know, that is normally the</p> <p>14 only call I have with MetLife.</p> <p>15 Q. Do you remember a woman named Kimberly</p> <p>16 Astorga?</p> <p>17 A. No.</p> <p>18 (Whereupon claim activity was</p> <p>19 marked for identification as</p> <p>20 Verizon-8.)</p> <p>21 BY MS. BURKE:</p> <p>22 Q. The claims record from MetLife.</p> <p>23 Meaning every single contact they had with</p> <p>24 either Verizon or Ms. Walker or her position</p>

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<p>1 are logged into a system. I don't expect you</p> <p>2 to be familiar with this document, but if you</p> <p>3 are you can let me know. Do you recognize this</p> <p>4 document?</p> <p>5 A. No.</p> <p>6 Q. So it is a series of claims notes, and</p> <p>7 I only printed the pertinent ones for any</p> <p>8 questions I have with you, but if you look</p> <p>9 there is claim number, meaning which leave</p> <p>10 request this relates to, and this is for one</p> <p>11 particular claim in 2013.</p> <p>12 A. Okay.</p> <p>13 Q. Now, there is a comment section in</p> <p>14 here, that will identify dates and who it is</p> <p>15 completed by. If you look at the entry on the</p> <p>16 bottom of this first page, you and I a moment</p> <p>17 ago were looking at a June 6, 2013 letter about</p> <p>18 her approval through July. Do you remember</p> <p>19 that letter we were just looking at?</p> <p>20 A. Yes.</p> <p>21 Q. Here it says, in the subject comments</p> <p>22 area, sent decision notice to ER, that means</p> <p>23 employer, and ICM letter to EE, meaning</p> <p>24 employee. Do you see that?</p>	<p>1 universe, I mean, so I look at it, I don't pay</p> <p>2 particular attention to it.</p> <p>3 Q. No, I am not suggesting you have any</p> <p>4 control over FMLA leave, you don't approve or</p> <p>5 deny, correct?</p> <p>6 A. Correct.</p> <p>7 Q. MetLife says it is either approved or</p> <p>8 denied, this is needed or that is needed, is</p> <p>9 that fair?</p> <p>10 A. Yes.</p> <p>11 Q. They keep you in the loop, right?</p> <p>12 A. Yes.</p> <p>13 Q. They send you something via email, that</p> <p>14 is your testimony?</p> <p>15 A. Yes.</p> <p>16 Q. What is it you are saying, you don't</p> <p>17 pay too much attention to it, is that fair?</p> <p>18 A. I look at the dates, I give it a</p> <p>19 review, but I don't recall particular emails on</p> <p>20 this matter.</p> <p>21 Q. As we sit here today do you still get</p> <p>22 emails if, in fact, an employee is approved or</p> <p>23 denied for FMLA?</p> <p>24 A. I don't think FMLA, like I believe I</p>
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<p>1 A. Yes.</p> <p>2 Q. Here in the comment area decision</p> <p>3 notification for Suzette Walker, and it gives</p> <p>4 the claim number from Kimberly Astorga, and it</p> <p>5 says to, if you turn to the next page, it has</p> <p>6 your name there and then Joseph Snyder. He was</p> <p>7 the director at the time, correct?</p> <p>8 A. Yes.</p> <p>9 Q. So do you believe that that would</p> <p>10 reflect that you, in fact, received the</p> <p>11 decision letter?</p> <p>12 MR. BARRAS: Objection. You can</p> <p>13 answer.</p> <p>14 THE WITNESS: I would assume, yes,</p> <p>15 I did.</p> <p>16 BY MS. BURKE:</p> <p>17 Q. These letters that you and I were</p> <p>18 looking at a moment ago, do you receive copies</p> <p>19 of these?</p> <p>20 A. I believe it is all emails, so I am</p> <p>21 sure I got the email.</p> <p>22 Q. Did it have an attachment to the email?</p> <p>23 A. I really -- when I get the MetLife, it</p> <p>24 is not -- I have no control, it is out of my</p>	<p>1 get an email still from MetLife saying that</p> <p>2 person is approved from this date to this date</p> <p>3 and then, you know, return because I just had</p> <p>4 someone who is out, and I think I got just an</p> <p>5 email, I think that is all I got.</p> <p>6 Q. So do you believe Joe Snyder might have</p> <p>7 been the director in early 2013?</p> <p>8 A. Yes.</p> <p>9 (Whereupon claim activity was</p> <p>10 marked for identification as</p> <p>11 Verizon-9.)</p> <p>12 BY MS. BURKE:</p> <p>13 Q. This is another part of the claims</p> <p>14 notes but for a different date. If you go down</p> <p>15 all the way at the bottom, July 16 3:38 p.m.</p> <p>16 entry. Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. In the subject comments area Ms.</p> <p>19 Astorga puts ER, employer, confirmed EE</p> <p>20 returned to work on Monday, 7/15/2013 working.</p> <p>21 Comment, five hours per day, spoke with Brian.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Does that help refresh your</p>

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<p>1 recollection of whether or not you spoke with 2 anyone about any kind of limited work hours 3 that Ms. Walker would be working upon her 4 return from leave? 5 A. Yes. 6 Q. Do you have any reason to disagree that 7 you had a conversation with someone at MetLife 8 about Ms. Walker's return to work and what 9 hours she was, in fact, working? 10 A. I have no reason to disagree. 11 Q. How long was Ms. Walker permitted to 12 come back on a five hour per day work schedule? 13 A. I don't know. 14 Q. Was she asked to provide any medical 15 documentation to substantiate that she needed 16 to only work five hours a day? 17 A. Not to me. 18 Q. Do you know if that was provided to 19 someone else, either MetLife, HR, otherwise? 20 A. I don't know. 21 (Whereupon doctor's note was marked 22 for identification as Verizon-10.) 23 BY MS. BURKE: 24 Q. This is being marked as Verizon-10. It</p>	<p>1 Q. Did you speak with her at some point 2 and inform her that she had to come back to 3 work full duty? 4 A. No. I don't recall ever having a 5 conversation with her about that. 6 Q. Did she ask if she could come back with 7 any kind of limited work hours or you don't 8 remember? 9 A. I don't recall the conversation to 10 that. 11 Q. So claim notes from September of 2013. 12 Can we mark this, please. 13 (Whereupon claim activity was 14 marked for identification as 15 Verizon-11.) 16 BY MS. BURKE: 17 Q. This is yet another page of entries 18 from the claims notes. If you look toward the 19 bottom here, it is an entry for 9/18/2013 at 20 9:45 a.m. Are you at that entry? 21 A. Uh-huh. 22 Q. Sorry, you have to say yes or no out 23 loud even though I know what you mean. 24 A. I'm sorry, please ask the question</p>
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<p>1 is a September 10, 2013 note from Ms. Walker's 2 doctor, and in the prescription area identifies 3 Ms. Walker will be working five hour day on 4 10/1/13, six hour day on 11/1/13 and finally an 5 eight hour day on 12/1/13. Do you see that? 6 A. Yes. 7 Q. Do you recall if that schedule actually 8 took place where Ms. Walker from October 9 through December of 2013 that her hours 10 steadily increased each month? 11 A. I am sure they did, I don't recall that 12 to be exact, I don't recall. 13 Q. If she did or didn't? 14 A. Right. 15 Q. Did you personally have any 16 conversations with Ms. Walker about what her 17 schedule would be, how many hours she would be 18 working? 19 A. No. 20 Q. Never discussed that once? 21 A. She might have come and told me. I 22 don't ever recall asking her any questions 23 about her schedule. Once again, I feel all 24 that goes through MetLife.</p>	<p>1 again. 2 Q. I am making sure you are on the same 3 entry that I am, 9/18/2013 at 9:45 a.m. 4 A. Yes, I'm looking at that now. 5 Q. So this is a summary of an the employee 6 with Ms. Walker and I want to read it to you 7 and then I have a question for you. In the 8 comments area CS told her she tried to call her 9 yesterday, employee stated that her supervisor 10 told her she needed to return full time full 11 duty on 10/7/2013. ER, employer, only allows 12 12 weeks of reduced hours. Then it talks 13 further what the employee discussed with 14 Kimberly Astorga. 15 A. Okay. 16 Q. Did Ms. Walker have any other 17 supervisors in September of 2013 besides you? 18 A. No. I kind of recall this. 19 Q. What is your recollection of the 20 conversation with Ms. Walker regarding her 21 working? 22 A. I believe I got a notice from MetLife 23 saying that, you know, basically what is 24 written here, that it only allows 12 weeks, and</p>

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<p>1 I was told to communicate that to her.</p> <p>2 Q. Who told you to communicate that to</p> <p>3 her?</p> <p>4 A. MetLife rep.</p> <p>5 Q. Just from a math standpoint, 12 weeks</p> <p>6 of leave, that is three months, so if she</p> <p>7 started her leave April 26th, her leave would</p> <p>8 have exhausted, all 12 weeks, as of July,</p> <p>9 right?</p> <p>10 A. I don't have a calendar in front of me</p> <p>11 right now and a lot is being thrown at me.</p> <p>12 Give me a calendar and I will -- do you want me</p> <p>13 to count it out?</p> <p>14 Q. So the only thing I was trying to</p> <p>15 establish is when the 12 week period would have</p> <p>16 ended from when she commenced her leave. So if</p> <p>17 her leave commenced on April 26, 2013, three</p> <p>18 months from then, the entire month of May, June</p> <p>19 and July, her 12 weeks would have exhausted</p> <p>20 sometime in or about late July, correct?</p> <p>21 MR. BARRAS: Object. You can</p> <p>22 answer.</p> <p>23 THE WITNESS: Counting 12 weeks</p> <p>24 would be July 19th, if I am counting</p>	<p>1 A. Without like a medical, I don't know</p> <p>2 how that would have been done.</p> <p>3 Q. Well, she gave this medical to someone,</p> <p>4 right, V-10?</p> <p>5 MR. BARRAS: Objection.</p> <p>6 THE WITNESS: Uh-huh.</p> <p>7 BY MS. BURKE:</p> <p>8 Q. You have to say yes or no, not uh-huh.</p> <p>9 MR. BARRAS: Objection. You can</p> <p>10 answer.</p> <p>11 THE WITNESS: I would imagine she</p> <p>12 gave that to -- she should have</p> <p>13 submitted that to MetLife, that is not</p> <p>14 handled, you know, by me.</p> <p>15 BY MS. BURKE:</p> <p>16 Q. So for the 2013 evaluation she was out</p> <p>17 of work in 2013 from at least April 26, 2013 to</p> <p>18 late July of 2013, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Then was there any account given to</p> <p>21 that fact within the 2013 performance</p> <p>22 evaluation and your decision to rate her</p> <p>23 developing?</p> <p>24 A. No.</p>
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<p>1 correctly on the calendar you provided.</p> <p>2 BY MS. BURKE:</p> <p>3 Q. So from the end of July up and through</p> <p>4 September was she working in any limited hours</p> <p>5 capacity or not?</p> <p>6 A. I believe she was.</p> <p>7 Q. So having now just looked at some of</p> <p>8 these claims notes from MetLife and her</p> <p>9 doctor's notes do you know if that continued up</p> <p>10 until December 1st or did that stop sometime in</p> <p>11 September or October?</p> <p>12 A. Like I am going by memory. I think</p> <p>13 this conversation, and I think I told her to</p> <p>14 call MetLife, and I think that was it. I don't</p> <p>15 recall what happened afterwards right now,</p> <p>16 would have to -- I really don't recall what</p> <p>17 happened afterwards.</p> <p>18 Q. Did you personally have any</p> <p>19 conversation with her about whether or not it</p> <p>20 was feasible for her to work either six or</p> <p>21 eight hours a day for the next several months?</p> <p>22 A. No.</p> <p>23 Q. Would she have been able to do that in</p> <p>24 light of what her job responsibilities were?</p>	<p>1 Q. Are you on the 2013 evaluation, as far</p> <p>2 as Verizon-5. You can put those other ones</p> <p>3 aside for now.</p> <p>4 A. Yes.</p> <p>5 Q. The areas identified objectives, and</p> <p>6 you see this entire box here on DEF Walker</p> <p>7 Bates stamp 2, page 2 of this?</p> <p>8 A. Okay.</p> <p>9 Q. Who puts all that information there?</p> <p>10 A. It would be joint, both I would put</p> <p>11 some and the employee would put some.</p> <p>12 Q. This language is contained in here</p> <p>13 above manager comments optional, on page 2, was</p> <p>14 that the same language that was contained in</p> <p>15 anybody's evaluation who was doing conduit</p> <p>16 work?</p> <p>17 A. So are you referring to the top block</p> <p>18 on page 2?</p> <p>19 Q. Yes.</p> <p>20 A. They were all put in by Suzette.</p> <p>21 Q. In terms of the objectives?</p> <p>22 A. Well, that was Levin Decredo, and</p> <p>23 employee accomplishment status, I think she</p> <p>24 wrote all of that.</p>

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<p style="text-align: right;">Page 65</p> <p>1 Q. So the entire bullet point entry on 2 page 2, you believe Ms. Walker wrote that? 3 A. Yes. 4 Q. What about under accelerate revenue 5 growth, who inputted that information? 6 A. I would have put in SFU Greenfields, 7 MDU/MTU overloads, MDU/MTU Greenfields and 8 support new products, expansion fiber to the 9 cell site. 10 Q. What does SFU Greenfield stand for? 11 A. Single family unit, Greenfield 12 associate with our Fios development. 13 Q. What about MDU/MTU, what is that? 14 A. Multi dwelling unit. The MDU is 15 residential, MTU is business and overlays are 16 an existing building to add the Fios facility 17 to an existing building. 18 Q. In doing conduit work were you 19 measuring her YTD Fac Verification or not until 20 she had a turf? 21 A. Not until she had a turf. She would 22 have been more in a support role in the conduit 23 department. 24 Q. Doing survey and design for high</p>	<p style="text-align: right;">Page 67</p> <p>1 local exchange guy wants to lease our 2 facilities so that is a third party work, that 3 is an administrative function. A request comes 4 over, you reply to it, you send the work to a 5 contract services group, and then you go back 6 to the third party and give them the results. 7 Q. So what aspects of the conduit then 8 were actually engineering work? 9 A. Conduit work that is engineering is 10 any -- it is design, repair maintenance of that 11 pipe. The conduit, which is what the conduit 12 department is there for, that pipe that would 13 go to residential and business customers, that 14 we have in the public right of way or private 15 property. 16 Q. Was she designing new pipes in certain 17 areas? 18 A. That would have been her 19 responsibility, yes. 20 Q. We are still in the box for accelerate 21 revenue growth, see where it says support new 22 products and global product expansion, FTTCs, 23 what is that? 24 A. Fiber to the cell site.</p>
<p style="text-align: right;">Page 66</p> <p>1 bandwidth orders, was that something she was 2 doing in a conduit department or only when she 3 had a turf? 4 A. Only when she had a turf. 5 Q. Which part of her role in doing conduit 6 work was core engineering work? 7 A. I'm sorry, say that again. 8 Q. Which part of her job responsibilities 9 in doing this conduit work was core engineering 10 work? 11 A. I think it would have been, should have 12 been all of it. 13 Q. What aspects -- 14 A. Except for the part that is not -- I 15 would say core is the administration of the 16 third party work is more of an administrative 17 function and not core engineering work. 18 Q. When you say administration of a third 19 party function getting Gerry Slattery involved? 20 A. I don't know what you mean, getting 21 Gerry Slattery involved. 22 Q. What do you mean by administration of a 23 third party function? 24 A. That is the work for, if a select, a</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. What does that mean? 2 A. Cell sites are supported by fiber 3 facilities now. So anywhere you have a cell 4 tower you generally have fiber facilities up to 5 that cell tower, so that is the backbone of the 6 cell network. 7 Q. Where it says employee 8 accomplishments/status, did she input that 9 information or did you? 10 A. She did. 11 Q. On the next page, Walker page 3, the 12 increased profit margin area, did you complete 13 all those entries or did she? 14 A. Under description and measure? 15 Q. Yeah. 16 A. I would have completed those. Under 17 employee accomplishment and status sheet she 18 would have completed that. 19 Q. On page 5 did you sit down with her in 20 August of 2013 to do a mid year? 21 A. Yes. 22 Q. Do you believe that this August 5, 2013 23 date is about right? 24 A. Yes.</p>

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<p>1 Q. Is the employer required to sign at mid 2 year or no? 3 A. No. 4 Q. In the manager performance summary area 5 you completed that, right? 6 A. Yes. 7 Q. Suzette was moved to conduit/highway in 8 the first half of the year due to existing 9 knowledge of conduit and the City permit 10 process. Do you see that? 11 A. Yes. 12 Q. The first half of the year, early 2013 13 or do you still think it was sometime in 14 December 2012 when she moved over to 15 conduit/highway? 16 A. I think she was moved in that December 17 time frame. 18 Q. How did she have existing knowledge of 19 conduit? 20 A. She was the drafting supervisor, so the 21 drafters are involved in the City permit 22 process. The drafters also are responsible at 23 that time frame to draw in the conduit drawings 24 and post in it. So as a supervisor you would</p>	<p>1 Q. From what time period? 2 A. During this review time. 3 Q. Was that an on site or an off-site 4 contractor? 5 A. On site contractor. 6 Q. Was it Gerry Slattery? 7 A. Yes. 8 Q. He had been doing all her work while 9 she was out on medical leave, right? 10 A. Yes, he did the work while she was on 11 medical leave. 12 Q. You note she has missed some time due 13 to an injury. Was that her shoulder injury? 14 A. I would imagine that is what I am 15 referencing. I didn't know what her injury 16 was, just due to an injury. 17 Q. Which made the transition difficult. 18 The transition of having Ms. Walker take back 19 the job functions from Gerry Slattery? 20 A. I think I just was documenting just 21 that is what, you know, happens. She had 22 missed time during that period. 23 Q. I am just wondering what the transition 24 is you refer to since you wrote this, which</p>
Page 70	Page 72
<p>1 have intimate knowledge of those items since 2 you are supervising those functions. 3 Q. GPIS review has been a positive 4 transition. What is GPIS? 5 A. GPIS is the City of Philadelphia permit 6 system. 7 Q. Conduit design has been hard to 8 transition. What does that mean? 9 A. She went towards more of the 10 administrative function and didn't -- wasn't 11 making advances into core functions of conduit 12 design. 13 Q. Was she not doing the designs? 14 A. I don't think she was doing the 15 designs. 16 Q. Who was doing them then? 17 A. I think she was giving it to the 18 contractor. From that time period the 19 contractor making all the decisions. 20 Q. Can you please read back his last 21 statement, please? 22 (Whereupon the court reporter read 23 back from the record.) 24 BY MS. BURKE:</p>	<p>1 transition was made difficult? 2 A. From supervisor role to conduit 3 engineer. 4 Q. This says the conduit area is still set 5 up for the former conduit engineer and I have 6 received complaints about the conduit mailbox 7 being full. Who is the former conduit 8 engineer? 9 A. I believe it was Jim Conte. 10 Q. Why did he leave the role? 11 A. Took a supervisor role. 12 Q. Is that a lateral move? 13 A. They make more because they are 14 supervising. They make more, their band is 15 bigger because they are supervising people. He 16 took it for an outside technician who makes 17 more money, so your salary is kind of related 18 to their salary. 19 Q. The conduit area is still set up for 20 the former conduit engineer, Jim Conte, how is 21 it still set up for him? 22 A. Like wasn't -- I would say she didn't 23 move into that space, that is what it was. 24 Suzette didn't move into the spot, there is a</p>

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<p style="text-align: right;">Page 73</p> <p>1 conduit cube, if I remember correctly, and she 2 didn't move right away over to the conduit cube 3 where the records, where -- well, there is some 4 records but they are other places too, but 5 where the contract engineer was sitting. So 6 that cube has always been for the conduit 7 people. 8 Q. The mailboxes, is that an email inbox 9 or a hard mailbox where things are placed? 10 A. For it to be full it had to be a voice 11 mailbox. 12 Q. So associated with a particular 13 extension? 14 A. Yes. 15 Q. For that cube? 16 A. Yes. 17 Q. Why didn't you ask her to move over to 18 the cube sometime in January then of 2013? 19 A. I believe I did. 20 Q. February, did you ask? 21 A. I believe I asked her in that, you 22 know, that time of the whole transition, you 23 are going to conduit, expectation you would 24 move into conduit.</p>	<p style="text-align: right;">Page 75</p> <p>1 was completely out of work? 2 A. Yes. 3 Q. So as of August 5th she had only been 4 back to work several weeks from her medical 5 leave, right? 6 A. Uh-huh. 7 Q. Sorry, you have to say yes or no. 8 A. I would say yes. 9 Q. You are not even sure it was eight 10 hours a day, right? 11 A. I am not sure of that time, correct. 12 Q. When you put the Phila/Delaware team 13 has mixed results on the FOC metric, what does 14 that mean? 15 A. That was my team at the time saying FOC 16 metric, so that is what the FOC stands for, we 17 call it FOC, which is the orders come in for 18 special services through a system called 19 request net, and the FOC time is the amount of 20 time it is held in engineering. So when it 21 comes into the engineering to when we send it 22 to the next teams. 23 Q. So when you say the 24 Philadelphia/Delaware team has mixed results on</p>
<p style="text-align: right;">Page 74</p> <p>1 Q. You wanted her to physically move 2 somewhere, right? 3 A. Yes. 4 Q. You are saying this happened from 5 December all the way she went out on a medical 6 leave? 7 A. I mentioned it, yeah, it was prolonged 8 time I know that. 9 Q. Then did she ever move to that cube? 10 A. Yes. 11 Q. When? 12 A. I can't give, pinpoint the exact date 13 of it. 14 Q. Would you have any documentation 15 reflecting that you asked her to move to that 16 cube or needed her to sit there? 17 A. No. 18 Q. We are not where the conduit/highway 19 team needs to be at this time. Who is the 20 conduit/highway team? 21 A. It would be -- in this case it would 22 have been Suzette and Gerry. 23 Q. Was Gerry doing everything that he 24 needed to do between April and July while she</p>	<p style="text-align: right;">Page 76</p> <p>1 that metric, you mean your team as a whole, not 2 just Suzette Walker, correct? 3 A. We are referring to the team as a 4 whole, yes. 5 Q. They were missing DS1 and OCN? 6 A. Correct. 7 Q. What does that mean? 8 A. DS1, OCN, DS3 and Ethernet are all 9 classes of services of specials. 10 Q. What do you mean they were missing 11 them? 12 A. So the FOC time, the amount of time it 13 was taking them for it to come in to answer, 14 they were over metric in those categories. 15 Q. They weren't making the mark for the 16 capital metric either? 17 A. Right, saying that we were over 18 spending capital, that is what that is saying. 19 Q. I apologize, I think I asked you this 20 before. When she was working doing conduit 21 highway, you weren't measuring her Fac 22 Verification or SR scores? 23 A. Correct, because she wouldn't have been 24 answering every question, no. She was in a</p>

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<p>1 support role, so if an engineer was working one</p> <p>2 and needed conduit, that would have been where</p> <p>3 she would have came into it.</p> <p>4 Q. When you sat down with her in August of</p> <p>5 2013 regarding this review, did you tell her</p> <p>6 that she was not supposed to continue utilizing</p> <p>7 Gerry Slattery?</p> <p>8 A. I directed her to, I wanted her to take</p> <p>9 on the conduit role, take a greater emphasis on</p> <p>10 the conduit role. I wanted Gerry Slattery to</p> <p>11 be just support.</p> <p>12 Gerry Slattery as an on-site</p> <p>13 contractor, we can only have for two and a half</p> <p>14 years. At the end of two and a half years he</p> <p>15 has to leave. So I needed someone to absorb</p> <p>16 that conduit to have that conduit role after</p> <p>17 Gerry would have been gone.</p> <p>18 Q. Did you ever tell any of your engineers</p> <p>19 that they were supposed to use the contractors</p> <p>20 to get the work done because they are project</p> <p>21 managers?</p> <p>22 A. In the turf position?</p> <p>23 Q. Either.</p> <p>24 A. In the conduit position, no.</p>	<p>1 in her review, right?</p> <p>2 A. I believe I put that on everyone's</p> <p>3 review.</p> <p>4 Q. I have the evaluations, you can look at</p> <p>5 them if you want, I don't believe you put that</p> <p>6 in everyone's review. Do you agree with me</p> <p>7 that you may not have?</p> <p>8 A. Well --</p> <p>9 Q. You can look, Anthony is the first one,</p> <p>10 if you want to look at his as an example. His</p> <p>11 2013 year review.</p> <p>12 A. PDFs?</p> <p>13 Q. Yes. I am just using Anthony because</p> <p>14 he is the first. So this first one, and just</p> <p>15 for the record I am looking with the witness at</p> <p>16 Portolese's 2013 review, starts with Bates</p> <p>17 stamp 268. So if we go to the final box that</p> <p>18 we are looking at Ms. Walker for the year end,</p> <p>19 manager comments. Here is the mid year</p> <p>20 summary, and here is the manager comments, they</p> <p>21 start here. Do you see that?</p> <p>22 A. Yes, that is not me.</p> <p>23 Q. You didn't fill this out?</p> <p>24 A. Look through, but a lot of writing.</p>
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<p>1 Q. Not in the conduit but in turf?</p> <p>2 A. Yes.</p> <p>3 Q. Can you go to page 6, the year end</p> <p>4 comments, DEF 006, I think it is the next page?</p> <p>5 A. Okay, I am on that page now.</p> <p>6 Q. Take as much time as you need to look</p> <p>7 at the manager performance summary, and let me</p> <p>8 know when you are ready.</p> <p>9 A. Okay, I have reviewed it.</p> <p>10 Q. Did you author this area?</p> <p>11 A. Yes, I did.</p> <p>12 Q. PA/Delaware had a very successful</p> <p>13 results year in 2013, capital expense MDU/MTU,</p> <p>14 prints issued, standard interval compliance</p> <p>15 were all positive. Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Which roles contributed to those</p> <p>18 positive results?</p> <p>19 A. Engineering department, we all play a</p> <p>20 part in that.</p> <p>21 Q. Did Suzette Walker?</p> <p>22 A. I am sure she played a part in that,</p> <p>23 yes.</p> <p>24 Q. If she didn't, you wouldn't have put it</p>	<p>1 Eugene Phelps signed it.</p> <p>2 Q. So we will look at someone else's. So</p> <p>3 was Carl Bowman on your team for 2013?</p> <p>4 A. Yes.</p> <p>5 Q. So this is his 2013, okay, for Carl</p> <p>6 Bowman, so if we go to the block area for the,</p> <p>7 this is mid year, the year end, okay?</p> <p>8 A. It looks very similar.</p> <p>9 Q. Let's use that as a point of reference,</p> <p>10 Bates stamp 299. Are we looking at Carl</p> <p>11 Bowman's?</p> <p>12 A. Yes.</p> <p>13 Q. When you say FOC intervals were</p> <p>14 negative for both the district and sub district</p> <p>15 teams, what does that mean?</p> <p>16 A. So FOC once again is the time frame</p> <p>17 when it comes into engineering to when the</p> <p>18 special circuit leaves engineering.</p> <p>19 Q. When you say both the district and the</p> <p>20 sub district teams, what does that mean?</p> <p>21 A. I would say first district I am talking</p> <p>22 about PA, Delaware because in the beginning I</p> <p>23 am talking about all PA, Delaware, where I am</p> <p>24 just a sub district of PA, Delaware.</p>

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<p>1 Q. Oh, okay.</p> <p>2 A. So saying not only did all PA, but we,</p> <p>3 hey, weren't a shining light, we also, you</p> <p>4 know, were negative.</p> <p>5 Q. So that could include Carl Gross' team</p> <p>6 as well then?</p> <p>7 A. The district. Carl Gross would be part</p> <p>8 of the district.</p> <p>9 Q. Then you summarize here that she had</p> <p>10 made a transition at the end of 2012 to the</p> <p>11 conduit department from a supervisory role, and</p> <p>12 remained with conduit all of 2013. Was it</p> <p>13 expected at any point in time after she</p> <p>14 transitioned out of conduit that she would go</p> <p>15 back?</p> <p>16 A. Once I removed her in 2013?</p> <p>17 Q. Yeah.</p> <p>18 A. No, I would not have put her back</p> <p>19 again.</p> <p>20 Q. Why did you give her a turf?</p> <p>21 A. I didn't think she -- the conduit role,</p> <p>22 I don't think she flourished in it, and wanted</p> <p>23 to give her a fresh start in 2014.</p> <p>24 Q. Did she do better in the other role?</p>	<p>1 services asking them to prove that there is an</p> <p>2 available path, and then you would reply back</p> <p>3 to the company that requested it and say there</p> <p>4 is an available path or there is not an</p> <p>5 available path.</p> <p>6 Q. When you say it was previously</p> <p>7 outsourced, who was doing that role?</p> <p>8 A. We sent it -- it was just to an</p> <p>9 off-site contractor.</p> <p>10 Q. We talked about this before, the final</p> <p>11 thing you say here, the core function conduit</p> <p>12 design was not performed by Suzette to the</p> <p>13 level necessary to demonstrate ownership. Was</p> <p>14 she doing any engineering work or not as much</p> <p>15 as you would have liked her to do?</p> <p>16 A. Not as much as I would have liked her</p> <p>17 to have done, yeah, and it is the decision, not</p> <p>18 just doing it, but to be the decisionmaker.</p> <p>19 Q. This assignment was an opportunity for</p> <p>20 growth, but Suzette kept a comfort zone and</p> <p>21 allowed the contract engineer, is that Gerry</p> <p>22 Slattery?</p> <p>23 A. Yes.</p> <p>24 Q. To run the conduit department?</p>
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<p>1 A. She had been a turf engineer before.</p> <p>2 Q. Did she perform better in that role</p> <p>3 than she did in the conduit role?</p> <p>4 A. She, I would say she performed better</p> <p>5 than she did in the conduit role, yes.</p> <p>6 Q. When you say in the new job she adapted</p> <p>7 to the conflict management function that was</p> <p>8 previously outsourced, what does that mean?</p> <p>9 A. She put a lot of energy into that</p> <p>10 administrative role of taking the request from</p> <p>11 the third party, request to lease our conduit,</p> <p>12 and she started doing that work. So that part,</p> <p>13 yeah, the conflict management work she took</p> <p>14 that on.</p> <p>15 Q. I apologize, what exactly did that</p> <p>16 involve?</p> <p>17 A. So we have -- we get requests from</p> <p>18 CLECs we call them, competitive local exchange</p> <p>19 carriers, to lease our conduit. So you would</p> <p>20 get a request from the CLEC to utilize our</p> <p>21 conduit from Market Street to Race Street via</p> <p>22 9th Street, and you would package, you know,</p> <p>23 what facilities we have on 9th Street between</p> <p>24 those two points and send an email to contract</p>	<p>1 A. Yes.</p> <p>2 Q. Who is the conduit department, just</p> <p>3 Suzette and Gerry?</p> <p>4 A. Suzette and Gerry, yes.</p> <p>5 Q. How many days a week did Gerry work?</p> <p>6 A. I think Gerry was working four at that</p> <p>7 time.</p> <p>8 Q. Eight hour days?</p> <p>9 A. Yes.</p> <p>10 Q. Or more?</p> <p>11 A. No, eight hour days, and he probably in</p> <p>12 like spring and summer went to the four days</p> <p>13 because he golfed.</p> <p>14 Q. What about the fall and winter?</p> <p>15 A. He worked probably five days a week.</p> <p>16 Q. Are you guessing or you believe that is</p> <p>17 accurate?</p> <p>18 A. No, I am pretty sure that is accurate.</p> <p>19 I can look back at the time sheet, but that was</p> <p>20 kind of Gerry's MO.</p> <p>21 Q. Did you complete his time sheets?</p> <p>22 A. No.</p> <p>23 Q. Who verified his time?</p> <p>24 A. I would get an email to verify his</p>

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<p>1 time.</p> <p>2 Q. From payroll?</p> <p>3 A. From payroll company I think at that</p> <p>4 time.</p> <p>5 Q. So you gave her a developing, correct?</p> <p>6 A. Yes.</p> <p>7 Q. The new rating, would that have been</p> <p>8 applicable to Ms. Walker or that was only for</p> <p>9 actual new hires?</p> <p>10 A. That was for new hires.</p> <p>11 Q. Do you have any recollection of what</p> <p>12 Ms. Walker's feedback was as it pertained to</p> <p>13 this year end evaluation?</p> <p>14 A. I think she agreed.</p> <p>15 Q. As of the time you presented it to her</p> <p>16 in or about February of 2014 had she already</p> <p>17 transitioned to the turf, her turf?</p> <p>18 A. I am not sure of the exact date of it,</p> <p>19 it could have been right around the same time.</p> <p>20 Q. Let's take a break.</p> <p>21 (Whereupon a short recess was</p> <p>22 taken.)</p> <p>23 BY MR. BARRAS:</p> <p>24 Q. Who started doing the conduit work that</p>	<p>1 A. No. He passed away, I believe in the</p> <p>2 fall of 2015, and he was coming up on his like</p> <p>3 year, because you have to be off payroll for a</p> <p>4 year in order to even come back, so he had been</p> <p>5 off, so he was probably there until like that</p> <p>6 fall of 2014, yeah.</p> <p>7 Q. Did another contractor take his</p> <p>8 position?</p> <p>9 A. Yes.</p> <p>10 Q. Who would that have been?</p> <p>11 A. Rich Sullivan is currently in that</p> <p>12 position.</p> <p>13 Q. When Ms. Walker worked with Mr.</p> <p>14 Slattery did they work side by side?</p> <p>15 A. Once she moved into the cube, yes, they</p> <p>16 would have been across from each other.</p> <p>17 Q. Did Portolese move over next to Gerry</p> <p>18 Slattery?</p> <p>19 A. Yes.</p> <p>20 Q. When?</p> <p>21 A. As soon as he came into the department.</p> <p>22 Q. Was he already in your department at</p> <p>23 that point or did he come over from somewhere</p> <p>24 else?</p>
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<p>1 Ms. Walker was doing once she transitioned out</p> <p>2 of that role?</p> <p>3 A. Anthony Portolese.</p> <p>4 Q. Did he continue to work with Gerry</p> <p>5 Slattery?</p> <p>6 A. He did.</p> <p>7 Q. For how long?</p> <p>8 A. Until Gerry's term expired. I don't</p> <p>9 have the exact date of it.</p> <p>10 Q. Did that happen at some point?</p> <p>11 A. Yes.</p> <p>12 Q. At the natural expiration of the</p> <p>13 contract term?</p> <p>14 A. The two and a half years, yes.</p> <p>15 Q. If you have Gerry Slattery identified</p> <p>16 in your organizational chart, at least as of</p> <p>17 July 2014, you believe he was still there then?</p> <p>18 A. Yes.</p> <p>19 Q. Did he stay with Mr. Portolese doing</p> <p>20 conduit highway through the end of 2014?</p> <p>21 A. I can't say at this time, you know,</p> <p>22 without my record I can't say when he left.</p> <p>23 Q. Well, we are in 2016 right now, last</p> <p>24 year was 2015, was he still there last year?</p>	<p>1 A. He came over from the supervisor role</p> <p>2 in construction.</p> <p>3 Q. Not even at 900 Race Street, right?</p> <p>4 A. Right, he was not at 900 Race Street.</p> <p>5 He was a supervisor with construction and he</p> <p>6 came back to engineering in that first quarter,</p> <p>7 what I remember the first quarter of 2014. The</p> <p>8 date you had was April, so maybe it was April</p> <p>9 of 2015, I guess that is. Or '14.</p> <p>10 Q. '14?</p> <p>11 A. '14.</p> <p>12 Q. So he didn't already have a cube or</p> <p>13 office space set up when he came over, did he?</p> <p>14 A. I don't know what you mean.</p> <p>15 Q. When he came over from construction?</p> <p>16 A. Right, his cube was at a construction</p> <p>17 garage prior.</p> <p>18 Q. Did you automatically put him in the</p> <p>19 conduit highway area?</p> <p>20 A. Yes.</p> <p>21 Q. Is Rich Sullivan sitting with him</p> <p>22 still?</p> <p>23 A. Yes.</p> <p>24 Q. How is it that you monitor how much of</p>

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<p style="text-align: right;">Page 89</p> <p>1 the actual core contract work Portolese is 2 doing versus Sullivan? 3 A. Sullivan is doing all of the third 4 party work, and Anthony is doing all the 5 conduit work. 6 Q. How do you know that? 7 A. I interact with them. 8 Q. Just verbally? 9 A. Right. Well, at that time I would say 10 I changed the job positions this year to 11 accommodate a new responsibility I received 12 this year. So they are doing something 13 different than they did before starting January 14 of this year. 15 Q. January 2016 Mr. Portolese and Rich 16 Sullivan are doing something different? 17 A. Their roles are a little different, 18 yes. I have another contractor that came in 19 too, so there is two contractors and Anthony in 20 the same cubicle now. 21 Q. Doing conduit highway? 22 A. Doing parts of conduit highway. 23 Q. Who is the other contractor? 24 A. Mike Wagner.</p>	<p style="text-align: right;">Page 91</p> <p>1 Q. How long did that transition take? 2 A. I would say till Gerry, I think he was 3 out that year, so just kind of finished up, you 4 know, Gerry's term. I think they -- I tried 5 to, okay, who would do what areas, but Anthony 6 just started taking over, you know, any new 7 jobs that came in, and Gerry finished up with 8 ones that had been already there. 9 Q. Well, how fast did you want or did you 10 anticipate that Suzette Walker would be able to 11 transition into taking over the things that 12 Gerry was handling while she was out for three 13 months? 14 A. If she was out for three months she 15 wouldn't have been able to, you know, do the 16 work, she wasn't working. 17 Q. I meant when she came back? 18 A. Oh, immediately, yeah, same kind of 19 transition. It is not -- she didn't have -- 20 she just had to start taking the new work over. 21 The work is existing, and we let the person 22 transition through, but anything new should 23 have been going through Suzette. 24 Q. Do you know what OSP engineering is?</p>
<p style="text-align: right;">Page 90</p> <p>1 Q. Is that why Portolese's reviews don't 2 have any Fac Verification numbers and SR 3 numbers? 4 A. In? 5 Q. Because he was doing conduit work. I 6 didn't see it in any of his reviews actually. 7 A. He would have some, yes. I know he has 8 done some, like the City project, those two COs 9 that he has are not hot beds for that, they are 10 hot beds more for growth, like residential 11 growth, but you do get things for the City and 12 Temple University with those turfs. 13 Q. So it is your testimony that Rich 14 Sullivan is doing mostly third party work? 15 A. In what time period? I am talking 16 about today or are we talking about last year? 17 Q. Well, let's strike that. Let's go back 18 to Gerry Slattery. When Anthony took over the 19 role and he was working with Gerry Slattery, 20 when did Gerry Slattery stop doing core 21 contract work, if at all? 22 A. What we did is we started like phasing 23 out what Gerry was doing and Anthony taking the 24 larger role.</p>	<p style="text-align: right;">Page 92</p> <p>1 A. Outside plant. 2 Q. The design of the 18th Street location 3 that he was involved in, do you remember that 4 or no? 5 A. Where are you reading from? 6 Q. From his performance evaluation. I 7 will just read the entire entry for you. 8 A. Sure. 9 Q. For the end of the manager summary, for 10 his 2014 evaluation you said, Anthony will 11 expand his knowledge of OSP engineering with 12 his assignment to the conduit role in 13 Philadelphia. His education, experience and 14 decisionmaking ability are all put into 15 practice in this position, he made solid ground 16 in learning the new role and the processes 17 system associated with the permits and third 18 party. He also made a major impact on the 19 design of 18th Street location which protected 20 Verizon's interest and satisfied the 21 developer's needs. Does that help? 22 A. Yeah, it would have to be the Comcast 23 relocation job. 24 Q. Did he design that on his own or would</p>

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<p>1 he have assistance from the on-site contractor?</p> <p>2 A. He would have designed that on his own.</p> <p>3 Q. Is there a report of some sort that</p> <p>4 identifies by initial or employee number or</p> <p>5 something who would have handled the</p> <p>6 engineering responsibilities during the time</p> <p>7 that Ms. Walker was doing conduit work, meaning</p> <p>8 what she did versus what Gerry Slattery did?</p> <p>9 A. There is, like I see the print, so I</p> <p>10 see what goes out to the field. So is there...</p> <p>11 Q. Is the print either done by her or Mr.</p> <p>12 Slattery?</p> <p>13 A. Right, it has the name of who does the</p> <p>14 job on it.</p> <p>15 Q. Is that true also now that Anthony</p> <p>16 Portolese is working with Rich Sullivan?</p> <p>17 A. Yes.</p> <p>18 Q. Or Mike Wagner?</p> <p>19 A. Yes. Mike Wagner is not, just to</p> <p>20 explain, so what happened in 2016, there is</p> <p>21 further consolidation. I was given the</p> <p>22 responsibility to finish the Fios build in the</p> <p>23 City of Philadelphia. So with that</p> <p>24 responsibility, you know, individuals came to</p>	<p>1 tell.</p> <p>2 Q. The entire year of 2015? It appears to</p> <p>3 be for Gross, Hui and then yourself, Septak,</p> <p>4 Salinsky, Smail and Smith. Are these all</p> <p>5 managers of engineering?</p> <p>6 A. They are all managers, but different</p> <p>7 responsibilities, different geographies.</p> <p>8 Q. But all under Mucillo?</p> <p>9 A. Yes.</p> <p>10 Q. Let's go down just to your team, so if</p> <p>11 you go down to the third entry, you see where</p> <p>12 it says Magee?</p> <p>13 A. Yes.</p> <p>14 Q. These are all the engineers on your</p> <p>15 team, correct?</p> <p>16 A. Yes.</p> <p>17 Q. There is 16 of them, is that Tamasse,</p> <p>18 Daniel Tamasse an addition?</p> <p>19 A. He is an intern. Intern might not be</p> <p>20 the right term, he is like, it is called</p> <p>21 Verizon development leadership program, and</p> <p>22 they would do one a year in Verizon core, but</p> <p>23 he is really a Verizon Wireless employee.</p> <p>24 Q. Was he doing the exact same thing as</p>
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<p>1 work for me.</p> <p>2 Q. Before I get into her 2014 evaluation,</p> <p>3 if you go into your computer now, you can move</p> <p>4 it as close to you as you need, I want to go</p> <p>5 into some of these spreadsheets and what they</p> <p>6 reflect. So one is labelled 8/17. So this is</p> <p>7 a spreadsheet provided by your counsel</p> <p>8 recently. I want to go through it with you.</p> <p>9 If you go to the tab that says by engineer on</p> <p>10 the bottom.</p> <p>11 A. I don't see that tab.</p> <p>12 Q. Oh, I am on 8/16, I apologize. So for</p> <p>13 the record we are looking at an Excel</p> <p>14 spreadsheet, Bates stamp Walker 817. At the</p> <p>15 top left corner it identifies SR FAC verified</p> <p>16 performance and print issued intervals. Did</p> <p>17 you create this spreadsheet?</p> <p>18 A. No.</p> <p>19 Q. Where does it come from?</p> <p>20 A. We have a staff support person who runs</p> <p>21 reports.</p> <p>22 Q. This particular report, is this for a</p> <p>23 month or a week?</p> <p>24 A. This is for a year from what I can</p>	<p>1 your other engineers were doing?</p> <p>2 A. He was learning, yes.</p> <p>3 Q. So could you explain to me what is</p> <p>4 reflected in this chart? So let's start with</p> <p>5 the average facility verification, is it</p> <p>6 business days?</p> <p>7 A. Yes.</p> <p>8 Q. SR create to SOP comp?</p> <p>9 A. Uh-huh.</p> <p>10 Q. Now, even though this says 2015, let's</p> <p>11 just use Carl Bowman as an example, do you see</p> <p>12 where his entry is on line 44?</p> <p>13 A. Yes.</p> <p>14 Q. There is a category 1, 2, 3, 4. Do you</p> <p>15 know what that reflects, and if you look under</p> <p>16 1, there is 1 through 5, under 2 there is 5</p> <p>17 through 8, under 3 there is 9 through 13 and</p> <p>18 under 4 it is just 14 and 15.</p> <p>19 A. I'm sorry, I don't know where you are</p> <p>20 looking on it. Oh, okay. I think this report</p> <p>21 that we have is till April, the second week in</p> <p>22 April, that is what I think we are looking at.</p> <p>23 Q. So you believe 1 is the month of</p> <p>24 January, 2 February, 3 March, 4?</p>

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<p>1 A. I think this is a rolling report, and 2 just keeps adding weeks. This must have come 3 in a week, you know, which I would say probably 4 came that, the third week in April. 5 Q. Do they come in through email or? 6 A. Email, yes. 7 Q. How often do you get these type of 8 reports that we are looking at here? 9 A. Every day we get some type of report. 10 Q. Still using Carl Bowman for 11 consistency, okay? 12 A. Uh-huh. 13 Q. For the month of January, I guess there 14 were five weeks in that month, 2015, there are 15 three full weeks in January but only three days 16 in the first week. 17 A. But this 2015 results he would start 18 that first week, by taking whatever numbers 19 came in that first week. 20 Q. Oh, okay. 21 A. Like this report is 2015, so it is 22 everything that came in in 2015. 23 Q. So looking at Carl Bowman for week 24 number 1 in January it is blank. What does</p>	<p>1 Q. Now, in week two he answered 14 SRs? 2 A. No, that would be his average facility 3 verification business days of what he answered 4 that second week. 5 Q. Can you read that back to me, please? 6 (Whereupon the court reporter read 7 back from the record.) 8 BY MS. BURKE: 9 Q. So 14 is not the number he answered, it 10 is an average? 11 A. It is the average. So if you go over 12 to the right there is number of WRs, so two 13 were answered that week by Carl Bowman. 14 Q. I see in the top area you are talking 15 about number of WRs? 16 A. Right, in that column, line 39 has the 17 column headings. 18 Q. I see that. So for Carl Bowman if we 19 go across to week 2 it says two, that is how 20 many SRs he actually answered? 21 A. Correct. 22 Q. Then where does the average of 14 come 23 from? 24 A. The report is doing that. So it is</p>
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<p>1 that mean? 2 A. He didn't answer any SRs. 3 Q. What is an SR? 4 A. An SR is a service request for a 5 special circuit. I described earlier the FOC, 6 so this is what you are dealing with, that SR 7 is what your FOC. 8 Q. Do you use SR and FOC interchangeably? 9 A. No, they are two different. SR is the 10 actual service request, which would have the 11 customer's name, address, what they are 12 ordering, when they want it due, and so that is 13 coming through the system request net. The 14 engineers perform in the function of FOC, which 15 he is answering that SR. 16 Q. So Bowman didn't answer any SRs in the 17 first week, could that have been because he was 18 out or you have no idea? 19 A. I would say it might have been because 20 he is on vacation, not unusual, no. 21 Q. But you wouldn't know that by looking 22 at this chart, you would have to cross 23 reference? 24 A. I would have to look, yeah.</p>	<p>1 taking the two, and it is looking at how much 2 time he took on the two and just averaging it 3 for this. So that is happening behind the 4 scenes on this report. 5 Q. So if we look at, just going down the 6 column down to the next one that has an entry, 7 Dave Perry, line 46. 8 A. Yes. 9 Q. His is a seven. Do you see that? 10 A. On the week two, yes. 11 Q. If you go all the way down to his 12 number, his number of WRs is three. So that 13 week he answered more SRs than Carl Bowman? 14 A. That is what this would imply, yes. 15 That is what is being reported here. 16 Q. In you reviewing these reports by 17 looking at the 14 there for Mr. Bowman and the 18 seven there for David Perry, what do you glean 19 from those numbers? 20 A. Well, the facility verification is what 21 I would look at for what I see going out is 22 more I look at what ones are open each day. 23 Like I get a report that tells me all the ones 24 that need to be answered. So that is what I</p>

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<p>1 would review, you know, with the engineers. 2 Like here you have an open SR, where does it 3 stand, when can it be answered. 4 Q. Does this report show your open SRs? 5 A. It does not. This is reflecting what 6 they answer and the timeliness of answering, 7 and then this is also showing the prints issued 8 metric showing if they issued the print on 9 time. 10 Q. All right, we didn't get there yet so 11 let's go to it then. On line 39 in the middle, 12 the actual prints interval business days, is 13 that the average number of line days that it 14 actually took them to get print to the clients? 15 A. So from when they answered the SR to 16 when the print was issued, that is what that 17 would be a measure of. 18 Q. So sticking with Carl Bowman, week two 19 when it has a zero does it mean he got it out 20 on the same day? 21 A. It could be that he got it out before 22 the SR closed, that is what it could be, yeah. 23 There is also some SRs that you close that 24 might not need a work print, so you wouldn't</p>	<p>1 Q. Do you receive an actual monthly report 2 that is different than your rolling reports? 3 A. No, it is one and the same, but I am 4 saying like the week, I would take note of it 5 more after January to look at what is the 6 average at the end of January, what is the 7 average after February, what is the average 8 after March. 9 Q. So you have a full month for February, 10 right? 11 A. Right. 12 Q. In front of you. The report that you 13 and I are looking at right now, is there any 14 way to look at the averages for February so 15 that I could understand what you would be 16 looking at to know how your employees sized up 17 against one another? 18 A. I don't in this report, no. What I 19 would normally get, since these are coming out 20 weekly, this particular report, I would just 21 see the February report. 22 So like to see the end of February, 23 like there might be a way for the administrator 24 to, but I think he would just look for the</p>
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<p>1 have a work print. 2 Q. Because they already exist, right? 3 A. A facility, yes. So meaning if it has 4 a work print it is going to construction, you 5 can do jobs that will just have -- we have 6 another title, system tech, so you do a 7 facility, yes, and they can run, jump or 8 replace cards, do things like that. So that 9 quickens the time to get something in service. 10 So if you can do it, has a facility available, 11 yes, it is advantageous to do so. 12 Q. So right now just looking at week two 13 for Mr. Bowman and Mr. Perry, this average of 14 14 and an average of 7, and that it is zero 15 interval business days for Mr. Bowman and it is 16 10 for Mr. Perry, are you able to compare the 17 two qualitatively or no? 18 A. I wouldn't like on a week thing, like 19 at the end of the month, yeah, that is when I, 20 at the end of month I give it a little more. 21 Like we have a weekly call where I talk about 22 their jobs, their jobs open, and at the end of 23 the month I look to see, well, how did we do as 24 a team, how is everyone doing.</p>	<p>1 February report too because I know he is 2 pulling multiple reports together to generate 3 this. 4 Q. Where are the February reports 5 maintained? 6 A. It is a rolling report so it is 7 whenever you are looking at it is when, like 8 you would look at a previous email to see what 9 it was, like the month before. 10 So like if this is the middle of 11 February, so this shows you where everyone 12 stood at the middle of February, the second 13 week of February. 14 Q. Right. So I guess that is my question, 15 right now in June of 2016 what would I need to 16 look at to discuss with you how they did for 17 the month of February, your team? 18 A. I think you would need the report from 19 that first week in March, the end of February 20 report. 21 Q. Are you able to still pull that, do you 22 have access to it? 23 A. I don't think they can be pulled, it 24 would be what is stored, if someone has a</p>

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<p>1 stored report.</p> <p>2 Q. Do you still have them stored in your</p> <p>3 email?</p> <p>4 A. I don't. I guess I could go back, I</p> <p>5 might have some in there, but in my delete file</p> <p>6 I could certainly look.</p> <p>7 Q. Regarding open jobs did you generate an</p> <p>8 email to your team to summarize the call?</p> <p>9 A. No, it was already, it is generated</p> <p>10 every day. Every morning that open SR report</p> <p>11 goes out so whatever day I was having the call</p> <p>12 I would just reference that report. I wouldn't</p> <p>13 distribute it because it was already going to</p> <p>14 everyone.</p> <p>15 Q. Is there any particular week at issue</p> <p>16 here that you and I could look at to compare</p> <p>17 how the employees did in your opinion as their</p> <p>18 supervisor in looking at these numbers?</p> <p>19 A. Well, we could compare, this report</p> <p>20 sets up the second week of February, we could</p> <p>21 see where everyone stood the second week in</p> <p>22 February.</p> <p>23 Q. So under the column 2 we can take a</p> <p>24 look at week six?</p>	<p>1 of December number, yeah, I try to do it for</p> <p>2 whatever period that we are discussing.</p> <p>3 Q. So this we look at some averages as of</p> <p>4 the second week of April, and it generated an</p> <p>5 average for each one of your employees five</p> <p>6 through 10. Do you see that down the row?</p> <p>7 A. Yes. Wait a second, five through?</p> <p>8 Q. Five, and it goes all the way down to</p> <p>9 10 at the bottom.</p> <p>10 A. Oh, yes, yes, okay. I thought you were</p> <p>11 saying that was the span of numbers, that is</p> <p>12 why I was stopping.</p> <p>13 Q. Is it better to be lower or higher?</p> <p>14 A. Lower.</p> <p>15 Q. The average actual print interval</p> <p>16 business days, those averages, it starts with a</p> <p>17 zero and goes all the way down to a two. Do</p> <p>18 you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Is it better there to be lower?</p> <p>21 A. Better to be low.</p> <p>22 Q. I am doing this with you now so I don't</p> <p>23 have to sit for hours when I go through these</p> <p>24 on my own. The number of WRs, what is that?</p>
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<p>1 A. I think -- well, the way I would use</p> <p>2 this, I would roll to the end and we have the</p> <p>3 average facility business days as are created,</p> <p>4 as that would be year to date, whichever date</p> <p>5 this report came out and will tell where</p> <p>6 everyone stood on that date. And it would also</p> <p>7 tell how many number of SWRs that they</p> <p>8 answered.</p> <p>9 Q. I want to make sure I am looking at the</p> <p>10 same thing.</p> <p>11 A. Since this is a roll report, that is as</p> <p>12 of the second week of February they are the</p> <p>13 numbers, average up for us.</p> <p>14 Q. Now, when you put the Fac Verification</p> <p>15 numbers into a performance evaluation, where</p> <p>16 did you get them from?</p> <p>17 A. From the report such as this.</p> <p>18 Q. When you did it for mid year did you</p> <p>19 pull them from the end of July for everyone?</p> <p>20 A. Yeah, I should have done it, yeah,</p> <p>21 whichever the last report I had so it would</p> <p>22 have been the end of June is what I would have</p> <p>23 been trying to calculate.</p> <p>24 The end of year, I try to get the end</p>	<p>1 A. The actual number of SRs that were</p> <p>2 answered in that period.</p> <p>3 Q. So you could look at that average,</p> <p>4 though, and say or those numbers though and say</p> <p>5 that the person who did 29 was way better than</p> <p>6 the person that did three because what if the</p> <p>7 person that did three only got three orders, is</p> <p>8 that fair?</p> <p>9 A. Yeah, it is a measuring stick. It is</p> <p>10 one of the things I look at. If you are only</p> <p>11 having three there would be something, better</p> <p>12 be something else that you are doing.</p> <p>13 So I am seeing on there the person at</p> <p>14 three, if I can just scroll back and tell you</p> <p>15 who it is. So Scott Panichelli, so, yes, he is</p> <p>16 in Delaware, and he is handling all the FTTP in</p> <p>17 high risk growth FTTP area.</p> <p>18 Q. How would that impact his WR number?</p> <p>19 A. Well, that area is mostly a residential</p> <p>20 area, so you don't have businesses. Businesses</p> <p>21 will one day go to that area, I promise you,</p> <p>22 but right now it is just residential units</p> <p>23 being built there.</p> <p>24 Q. Number of orders with Fac Verification</p>

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<p>1 to, what is PL?</p> <p>2 A. Which column are we?</p> <p>3 Q. Right after number of WRs.</p> <p>4 A. Percentage facility verification to</p> <p>5 prints issued.</p> <p>6 Q. No, the one right before that, so</p> <p>7 number of orders with fact to PL?</p> <p>8 A. Yes, to printed issued within eight</p> <p>9 days. So number of orders, so.</p> <p>10 Q. Oh, prints issued?</p> <p>11 A. Yeah, the number within eight days.</p> <p>12 That interval of their prints being issued is</p> <p>13 variable based upon the size of the job that is</p> <p>14 demanded by answering the SR. Like you could</p> <p>15 have an SR that is just adding a piece of</p> <p>16 electronics or you could have one that requires</p> <p>17 you to run 5,000 feet of fiber.</p> <p>18 Q. Which could take more than eight days?</p> <p>19 A. Right. It would be, that interval</p> <p>20 could be 56 days so your prints issued metric</p> <p>21 is longer because it is based upon your overall</p> <p>22 interval.</p> <p>23 So what we said in engineering is,</p> <p>24 okay, no matter what, just try to get</p>	<p>1 was like an extra goal, hey, you know, it was</p> <p>2 trying to relay the message to get these out as</p> <p>3 soon as you can, but I didn't reference that</p> <p>4 that I recall on a performance appraisal.</p> <p>5 Q. So this just might be easier, we are</p> <p>6 still looking at the averages, and there is</p> <p>7 only one person with a 19 percent average, that</p> <p>8 is Suzette Walker, and only one person with a</p> <p>9 19 in the column are for average facility</p> <p>10 verification business days. Do you see that?</p> <p>11 A. Uh-huh.</p> <p>12 Q. Where does the 19 come from if she had</p> <p>13 16 WRs, is that the average number of days it</p> <p>14 took her to complete her --</p> <p>15 A. The facility verification piece from</p> <p>16 the SR create to the OSP complete, which we</p> <p>17 call the FOC. That is how long it took her to</p> <p>18 do the FOC.</p> <p>19 Q. An average number of 19 days?</p> <p>20 A. Yes, on her 16 jobs, that is how I</p> <p>21 would read that.</p> <p>22 Q. Do you know why her average actual</p> <p>23 prints interval business days is zero?</p> <p>24 A. I would say that is because the prints</p>
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<p>1 everything done within the eight days and we</p> <p>2 felt like that, the sooner we get it out to</p> <p>3 construction can help us get the overall job</p> <p>4 done quicker.</p> <p>5 Q. So the gentleman that you were</p> <p>6 referencing before because we were looking at</p> <p>7 him with the threes, Scott Panichelli, if you</p> <p>8 look at the number of orders that were done, I</p> <p>9 guess within the eight day period, was all</p> <p>10 three of his orders?</p> <p>11 A. Yeah, right. Again, if you are going</p> <p>12 to have a small volume that is what I would</p> <p>13 want to see.</p> <p>14 Q. Now, some of these individuals are not</p> <p>15 anywhere near the 100 percent, some are below</p> <p>16 50 percent. There is people at 15, 10, Suzette</p> <p>17 Walker is at 19. Now, obviously this isn't the</p> <p>18 end of the month, but are there variables that</p> <p>19 account for whether or not in your view that is</p> <p>20 unacceptable?</p> <p>21 A. The eight days I don't think I ever</p> <p>22 made a reference to that in like a performance</p> <p>23 one. To me that is related to your interval,</p> <p>24 you get the size of your job, so the eight days</p>	<p>1 are going out prior to the target. So you</p> <p>2 can't, like it could have been -- you are not</p> <p>3 going to show negative days, so it could be</p> <p>4 five days before you even had to issue it. So</p> <p>5 it is basically her average came in to that,</p> <p>6 nothing was issued, you know, later.</p> <p>7 So that could be -- it is tough because</p> <p>8 it is taking the ones that are before the date</p> <p>9 and the one after and it is coming out to zero.</p> <p>10 Once again, I don't give that average prints</p> <p>11 interval a big weight of it because of that</p> <p>12 variable you are getting with it.</p> <p>13 Q. Looking at these averages which one do</p> <p>14 you put the most emphasis on?</p> <p>15 A. I like the -- I look at the average</p> <p>16 facility verification and the number of WRs.</p> <p>17 They are the things that I key in on. I look</p> <p>18 at everything, but I key in on those in this</p> <p>19 report.</p> <p>20 Q. So for the average facilities</p> <p>21 verification the two was the best, that was for</p> <p>22 Mr. Panichelli?</p> <p>23 A. Uh-huh.</p> <p>24 Q. But obviously he only had three --</p>

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<p>1 A. Right.</p> <p>2 Q. -- SRs. So you weren't faulting him</p> <p>3 for only having three?</p> <p>4 A. Correct.</p> <p>5 Q. WRs or SRs, right?</p> <p>6 A. Right. In the big picture I use this</p> <p>7 to assign turfs and, you know, what is going on</p> <p>8 in the turfs. We can never -- we can't cookie</p> <p>9 cutter because we are dealing with set entities</p> <p>10 in Philadelphia, eastern, south and Delaware,</p> <p>11 and I can't control where things are built or</p> <p>12 where they come in to, so I try to put the</p> <p>13 turfs -- you are getting, you know, your</p> <p>14 geography is covering all equal in the end that</p> <p>15 I feel like everyone is busy.</p> <p>16 Q. 317 for WRs is the grand total, do you</p> <p>17 see that?</p> <p>18 A. Yes, done by my team.</p> <p>19 Q. Right. Then under the Fac Verification</p> <p>20 for business days at the bottom there is a 10,</p> <p>21 is that the average for your team?</p> <p>22 A. As of this date, yes.</p> <p>23 Q. As of the second week of April?</p> <p>24 A. Yes. My target would have been eight</p>	<p>1 A. They do, they are called provisioners</p> <p>2 so they do like a set role. They are not doing</p> <p>3 the same as a turf engineer, they are a</p> <p>4 separate group. Salinsky, Septak, Gross and</p> <p>5 myself are turf managers.</p> <p>6 Q. Salinsky, Septak and Gross, you guys</p> <p>7 were all turf managers?</p> <p>8 A. Yes.</p> <p>9 Q. Now, I notice in your list Portolese is</p> <p>10 not on there, is that because he was doing</p> <p>11 conduit work?</p> <p>12 A. I would say yes.</p> <p>13 Q. Now, I want to look at Ms. Walker's</p> <p>14 2014 evaluation because that does have scores</p> <p>15 that I want to chat with you now that I have an</p> <p>16 understanding of how you were measuring things.</p> <p>17 Here is your 2014 evaluation. If you go to</p> <p>18 page 15, I want to look at some of these</p> <p>19 numbers with you. Do you see where it says</p> <p>20 prints issued, do you see that area there, the</p> <p>21 first area, prints issued 136 versus 111?</p> <p>22 A. Yes.</p> <p>23 Q. Is 136 how many she issued?</p> <p>24 A. I would say yes.</p>
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<p>1 there.</p> <p>2 Q. Why is that?</p> <p>3 A. That is what was put out as our target,</p> <p>4 you know, eight for a facility verification.</p> <p>5 Q. During the entire year 2015?</p> <p>6 A. I believe so.</p> <p>7 Q. That was the same eight business days</p> <p>8 we were talking about before, though, right,</p> <p>9 the goal was to get the information sent to the</p> <p>10 client within eight business days?</p> <p>11 A. Correct.</p> <p>12 Q. So the gentleman below you, Silens?</p> <p>13 A. Salinsky.</p> <p>14 Q. Yeah. Was he overseeing engineers as</p> <p>15 well?</p> <p>16 A. Yes.</p> <p>17 Q. For that same time period his average</p> <p>18 Fac Verification was seven, so I guess do they</p> <p>19 do slightly better, his team?</p> <p>20 A. They are doing better than me on it,</p> <p>21 yes.</p> <p>22 Q. The people who only have two</p> <p>23 individuals are they doing different work like</p> <p>24 Smail?</p>	<p>1 Q. Is 111 the team average?</p> <p>2 A. Yes.</p> <p>3 Q. Hours issued. What is hours issued?</p> <p>4 A. It is like you look at the -- oh, wait</p> <p>5 a second, no, reverse that, because so the</p> <p>6 first number is the district average. Look at</p> <p>7 the top district average versus your average at</p> <p>8 mid year, so prints issued district average is</p> <p>9 136, Suzette's would be 111.</p> <p>10 Q. Okay.</p> <p>11 A. So of these prints issued, like the</p> <p>12 hours lets you know the scale, the size of the</p> <p>13 job. So the more hours the bigger the job, and</p> <p>14 the bigger job would take more time to do. So</p> <p>15 you try to understand what people are doing and</p> <p>16 what they have.</p> <p>17 So the average of the team their hours</p> <p>18 issued were 6,503 and Suzette was 3,137. So</p> <p>19 that would tell me she was doing smaller jobs,</p> <p>20 which you don't have control of, it is what</p> <p>21 area you are in, but it lets you know what is</p> <p>22 the district, how busy is the district.</p> <p>23 Q. Is that for the entire district or just</p> <p>24 your team?</p>

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<p>1 A. That would be my district.</p> <p>2 Q. So that would not include like Gross,</p> <p>3 for example?</p> <p>4 A. Correct.</p> <p>5 Q. ODNHH, what is that?</p> <p>6 A. ODN households is the, it is an FTTP</p> <p>7 term of when the houses are say completed and</p> <p>8 they are not yet ready for sale but they are</p> <p>9 built.</p> <p>10 Q. She had zero, does that mean maybe she</p> <p>11 didn't do any?</p> <p>12 A. That is what it would indicate, yes.</p> <p>13 Q. She may not have been assigned any</p> <p>14 either, right?</p> <p>15 A. Right.</p> <p>16 Q. NWCHH?</p> <p>17 A. Network create household. So they were</p> <p>18 put in service. So 166 units that weren't</p> <p>19 available for Fios before now are available for</p> <p>20 Fios as of this date.</p> <p>21 Q. Now, all those numbers that we just</p> <p>22 looked at, prints issued all the way down to</p> <p>23 number NWCHH, those numbers wouldn't impact</p> <p>24 your view of performance because those are</p>	<p>1 Q. He only had three orders and here she</p> <p>2 has six. Was there any view that you could</p> <p>3 take of these particular numbers right here to</p> <p>4 judge her performance or that wouldn't be</p> <p>5 something that you would do with these standing</p> <p>6 numbers alone?</p> <p>7 A. Well, looking just the standing</p> <p>8 numbers, saying hey, it's looking decent for</p> <p>9 this time of year for Suzette.</p> <p>10 Q. Based on her turf I guess?</p> <p>11 A. Six months in the turf and doing, yeah.</p> <p>12 Q. Suzette, your numbers look good</p> <p>13 considering your time in the turf. Take</p> <p>14 ownership of your turf and learn as much as you</p> <p>15 can during the remainder of this year on high</p> <p>16 bandwidth; is that right?</p> <p>17 A. That's correct.</p> <p>18 Q. If you can get your Fac Verification</p> <p>19 under 8 you will be making a big contribution</p> <p>20 to the team. Eight was the goal, right?</p> <p>21 A. Eight was the goal.</p> <p>22 Q. If we go to the next page, it says your</p> <p>23 average of Fac Verification 8.4 versus 12.7</p> <p>24 team's average. Do you see that?</p>
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<p>1 things beyond the employee's control, right?</p> <p>2 A. Right. They would let me indicate what</p> <p>3 is being worked on and what, you know, I am</p> <p>4 always looking to, you know, right size turfs</p> <p>5 so to look at what the person has on their</p> <p>6 plate.</p> <p>7 Q. Then average of Fac Verification, 18.2,</p> <p>8 that is the district average, right?</p> <p>9 A. Right.</p> <p>10 Q. Versus 10.3, that is her score?</p> <p>11 A. That was her mid year, yes.</p> <p>12 Q. So you told me earlier the lower the</p> <p>13 better, right?</p> <p>14 A. Correct.</p> <p>15 Q. So was that a good Fac Verification</p> <p>16 score?</p> <p>17 A. It was good when you look at the</p> <p>18 numbers so it was on six orders. So the volume</p> <p>19 is small, but, no, I am not upset with the</p> <p>20 10.3.</p> <p>21 Q. Then SR numbers, 25 versus 6. Now, we</p> <p>22 looked earlier, just as an example, in April of</p> <p>23 2015 that Mr., is it Panichelli?</p> <p>24 A. Correct.</p>	<p>1 A. Yes.</p> <p>2 Q. So she didn't get it under 8 but she</p> <p>3 got it pretty close, right?</p> <p>4 A. Pretty close.</p> <p>5 Q. So she made progress?</p> <p>6 A. Yes.</p> <p>7 Q. Your number of SRs 25 versus 57 team</p> <p>8 average. Now, does that number standing alone</p> <p>9 mean anything to you or no?</p> <p>10 A. Yeah, just the volume is not great, but</p> <p>11 she made effort to get that number towards</p> <p>12 eight, I see effort there.</p> <p>13 Q. Well, my question, though, with respect</p> <p>14 to both of her SR numbers, do you know how many</p> <p>15 she actually could have accomplished up to the</p> <p>16 August time period?</p> <p>17 A. I don't know what was still open at</p> <p>18 that time or held. You could have pending</p> <p>19 orders that you are carrying from one month to</p> <p>20 another.</p> <p>21 Q. But there is also varying reasons why</p> <p>22 someone might carry an order from one month to</p> <p>23 another, is that fair?</p> <p>24 A. Yes.</p>

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<p>1 Q. I am still on page 16, are you still 2 there? 3 A. Yes. 4 Q. Suzette continued to grow into the turf 5 role in 2014. She took the HBW, high 6 bandwidth, focus and moved her facility 7 verification number to metric. What does that 8 mean? 9 A. I am saying that 8.4 to me was, you 10 know, close enough, especially it was under. 11 The 8.5 if I average it down, she brought it to 12 metric of the 8. 13 Q. When you say she took the high 14 bandwidth focus what do you mean? 15 A. Means she took the high bandwidth focus 16 so saying hey, this is what we are doing, and 17 she is working towards that end. 18 Q. Suzette utilizes and manages the SOW 19 contractors well. What are SOW contractors? 20 A. They are the statement of work 21 contractors. 22 Q. How many was she working with, do you 23 know? 24 A. I have no idea. Once again you send it</p>	<p>1 learning what is coming back. Like it is 2 whatever is coming back to her is just coming 3 over to me and I am finding all the errors. So 4 the wrong product is used, the system is not 5 filled out correctly, so there was -- and that 6 is what we encouraged her, to learn your turf, 7 learn your responsibility, before you start 8 sending it out you have to learn it. 9 And that turf is like a good turf to 10 learn in because you are not getting big 11 volumes so you can go and survey that number of 12 jobs, so 25 in a year broken over 12 months, 13 two a month, you could do that, and you could 14 learn while you are doing that, and then that 15 would help the end product. 16 Q. Why would any concerns over the product 17 come to your attention directly? 18 A. Because that is how everyone else 19 charges their time based upon this work print. 20 The work print is for construction to charge 21 their time, it is also for construction to what 22 materials to order, what materials to bring to 23 the job, and then it is our permanent asset 24 also that is going on our books.</p>
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<p>1 to a firm, is the way it is supposed to work, 2 and they assign the workers. 3 Q. But would benefit from completing more 4 of the HBW surveys herself. Does that mean 5 actually physically going on site to conduct a 6 survey? 7 A. Yes. I view that as a way to learn the 8 full job. To manage something you have to know 9 it because you are getting product back, you 10 have to check that product. 11 Q. So when we talked a little bit earlier 12 you told me that once in reference to turf you 13 did tell your employees use the contractors to 14 get more work done, they're project managers, 15 is that fair? 16 A. I recall saying something to that, 17 yeah. 18 Q. When you say greater focus on the end 19 product of the contractors' product is 20 necessary, what does that mean? 21 A. So with that statement I am talking to 22 a whole group of various degrees of knowledge. 23 So Suzette, she is utilizing the SOW 24 contractor, but at the same time she is not</p>	<p>1 So the work print is a product that 2 engineering is responsible for delivering to 3 construction correctly. 4 Q. At what point in the process do you 5 review it then? 6 A. Before we go to construction. 7 Q. Do you review every single print that 8 all your engineers do? 9 A. In that time I was. 10 Q. Would you have any documentation that 11 would reflect any concerns with any prints that 12 were had with your engineers? 13 A. No, it would just be conversations and 14 just this, very focused on the product of the 15 contractors. So reference it here saying what 16 you are getting back from the contractor you 17 have to, you know, spend more time reviewing 18 and managing them so that it is not me doing 19 it. 20 Also, once it is coming to me its going 21 to be late because now it is going back to the 22 engineer who is now going to send it back to 23 the vendor, and the whole time the clock is 24 ticking.</p>

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<p>1 Q. Does every print come to you or not 2 then? 3 A. At that time every print came to me. 4 Q. So inevitably the print was going to 5 come to you at some point. You are just saying 6 if changes needed to be made that would impact 7 the time? 8 A. That is a negative to me, yes. 9 Q. If, in fact, there are errors or 10 something is wrong with it, that is going to 11 overall impact the employee's average Fac 12 Verification number? 13 A. This is for all types of work. That is 14 just one subset of our work, it is all work 15 that is being reviewed. So it is any job that 16 would have to go to construction. 17 So when we looked at, like in the mid 18 year that number was on there, so 111 prints, 19 those 111 prints are not just high bandwidth, 20 they are everything. 21 Q. So is Fac Verification just for high 22 bandwidth? 23 A. Yes, it is just one facet of what the 24 engineer does.</p>	<p>1 the conduit role to own it. 2 Q. Did she deserve the performing rating? 3 A. I gave it to her, so she deserved it. 4 I gave her what she deserved in my opinion. I 5 just wanted to stress that it was, that the 6 development was on the table. 7 Q. Was Mary Curtin the only one who got a 8 leading that year? 9 A. I would have to look. 10 Q. You can look at Verizon-2, that 11 exhibit, it is the rate and rank. It is the 12 second column, it says 2013 but I think we 13 agreed that was for calendar year 2014. 14 A. I don't see Mary Curtin, Tom Hodge. 15 Q. I'm sorry, yes, Thomas Hodge, he was 16 the only one that warranted a leading in your 17 opinion. 18 A. Yes. 19 Q. The areas for primary skills, technical 20 knowledge and Credo and others, those numbers 21 you just provided based on in your discretion 22 you think were warranted? 23 A. Yes. 24 Q. Was that from a 1 to a 5?</p>
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<p>1 Q. Do the SOW contractors only do high 2 bandwidth? 3 A. No. High bandwidth was considered the 4 product because it was a revenue generator, and 5 that is why we put the emphasis on it for the 6 eight days, and the engineers, it was up to 7 them, but the engineers usually did the survey 8 of the high bandwidth themselves. 9 Q. What is request net knowledge? 10 A. Request net is where those specials 11 come over, the SRs, and request net knowledge 12 is manipulating that request net in order to 13 achieve FOC with the orders. 14 Q. Why did you not give her a developing 15 rating on this particular evaluation? 16 A. It was discussed, it was discussed. I 17 felt like she, you know, the developing is also 18 a penalty, it has financial penalties to it, 19 and the performance, you know, is a better 20 rating, and I felt like, you know, fought for 21 her to give her encouragement. 22 I think she did enough to earn that 23 that year. Was everything perfect, no, but I 24 think she did more in this role than she did in</p>	<p>1 A. I believe so. 2 Q. What was the others category for? 3 A. Other was the second, you know, FTTP 4 proficiency, survey and design. 5 Q. Was that based on the Fac Verifications 6 course? 7 A. No. 8 Q. Was that just based on your personal 9 opinion about how proficient someone was with 10 FTTP and survey and design? 11 A. Yes. 12 Q. Your counsel is going to supply this 13 information, so I am only going to ask you for 14 your particular team of employees because there 15 is only 15 of them. 16 Scott Panichelli, is he Caucasian? 17 A. I would say yes, I believe he is. 18 Q. Mr. Hui, is he Caucasian, black, Asian? 19 A. Asian. 20 Q. What about Tom Hodge? 21 A. Caucasian. 22 Q. Steve Murphy? 23 A. Caucasian. 24 Q. Maria?</p>

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<p>1 A. Caucasian.</p> <p>2 Q. Mary?</p> <p>3 A. Caucasian.</p> <p>4 Q. Carl?</p> <p>5 A. Caucasian.</p> <p>6 Q. George?</p> <p>7 A. Caucasian.</p> <p>8 Q. Ernest?</p> <p>9 A. Caucasian.</p> <p>10 Q. What about John Shubbrook?</p> <p>11 A. Caucasian.</p> <p>12 Q. Dave Perry?</p> <p>13 A. Caucasian.</p> <p>14 Q. Joe?</p> <p>15 A. Caucasian.</p> <p>16 Q. Paul?</p> <p>17 A. Caucasian.</p> <p>18 Q. And Anthony?</p> <p>19 A. Caucasian.</p> <p>20 Q. Do you know if any of these people we</p> <p>21 just discussed took any form of family medical</p> <p>22 leave in 2013 or 2014?</p> <p>23 A. Off the top of my head I can't answer</p> <p>24 that.</p>	<p>1 A. One.</p> <p>2 Q. Was everybody on the conference call</p> <p>3 given a specific number?</p> <p>4 A. It wasn't given on that call, it was</p> <p>5 given later. We were told of the RIF and then</p> <p>6 I received a subsequent call with my number. I</p> <p>7 don't know what other people were told.</p> <p>8 Q. So as we sit here right now do you know</p> <p>9 what Gross, Septak or Salinsky were told as to</p> <p>10 how many people in their district would be</p> <p>11 impacted by the RIF?</p> <p>12 A. Only Carl Gross.</p> <p>13 Q. What did you know about his district?</p> <p>14 A. I know he was told one also.</p> <p>15 Q. Were you told at any point in time that</p> <p>16 if you had reason to disagree that someone</p> <p>17 would be impacted that they would discuss with</p> <p>18 you whether the employees could stay and there</p> <p>19 was someone else impacted on a different team?</p> <p>20 A. I would say that was an understanding,</p> <p>21 stuff just goes -- I would say yes. I am</p> <p>22 trying to answer your question the best I can,</p> <p>23 I think that question is a yes.</p> <p>24 Q. Yes, I understand your answer. So you</p>
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<p>1 Q. Or if they came to you seeking any kind</p> <p>2 of accommodations of any sort for a medical</p> <p>3 issue, do you know?</p> <p>4 A. Don't recall.</p> <p>5 Q. When was the first time that you were</p> <p>6 made aware by anyone that there was going to be</p> <p>7 a RIF that would impact your part of the</p> <p>8 organization?</p> <p>9 A. It was in the first quarter of 2015.</p> <p>10 Q. Who made you aware of that?</p> <p>11 A. My director, Joe Muccilo.</p> <p>12 Q. How?</p> <p>13 A. Telephone conference call with all the</p> <p>14 managers.</p> <p>15 Q. Were you told how many people had to be</p> <p>16 impacted in your group or was it discussed that</p> <p>17 they all should be ranked and it would be</p> <p>18 determined based on every respective ranking</p> <p>19 who would stay and who would go?</p> <p>20 A. I was told how many in my group I would</p> <p>21 have to identify.</p> <p>22 Q. You were given a specific number?</p> <p>23 A. Yes.</p> <p>24 Q. What number were you given?</p>	<p>1 were told first quarter of 2015?</p> <p>2 A. I think that is when it was. So</p> <p>3 sometime in the March time frame I think we</p> <p>4 were told.</p> <p>5 Q. How long did it take you to rank or</p> <p>6 rate your employees, was this done in one day?</p> <p>7 A. No.</p> <p>8 Q. How long did it take you?</p> <p>9 A. I probably spent, you know, I did it</p> <p>10 over a course of a week, and probably spent,</p> <p>11 probably about three to four hours on it.</p> <p>12 Q. Do you have something in the system</p> <p>13 where you know what their final rating was on a</p> <p>14 review that is easier than going back and</p> <p>15 pulling the electronic copies individually and</p> <p>16 looking at the final page?</p> <p>17 A. Yes. There is a system, an HR system,</p> <p>18 I can see everyone's rating, and I can go back</p> <p>19 on anyone's review to look at.</p> <p>20 Q. What is that program called?</p> <p>21 A. Under HR performance appraisals. I</p> <p>22 don't know if that is the exact title, but you</p> <p>23 go under performance.</p> <p>24 Q. Besides the performance appraisals did</p>

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<p>1 you look at anything else when you were</p> <p>2 performing this rate and rank of your team?</p> <p>3 A. Originally, no, I looked at the</p> <p>4 performance appraisals first.</p> <p>5 Q. And then?</p> <p>6 A. And then as the process, you know,</p> <p>7 continued I looked at all the metrics that were</p> <p>8 available to me.</p> <p>9 Q. What were those?</p> <p>10 A. This one that you provided today, the</p> <p>11 8/17 spreadsheet, but the date of it would have</p> <p>12 been aligned to whatever date it was that I was</p> <p>13 reviewing that.</p> <p>14 Q. In Verizon-2 you identify for Suzette</p> <p>15 her YTD Fac Verification is 19 compared to team</p> <p>16 average 10. What month, week, what was that</p> <p>17 for?</p> <p>18 A. It would have been whenever I was</p> <p>19 filling this out or providing this information.</p> <p>20 This was completed in conjunction with</p> <p>21 telephone calls with the HR person.</p> <p>22 Q. But you pulled the report to check the</p> <p>23 team average of what hers was at the time?</p> <p>24 A. Yes.</p>	<p>1 Q. Yeah. Because you had mentioned</p> <p>2 Suzette had a D rating, right?</p> <p>3 A. Well, I didn't give the D rating to</p> <p>4 Dave Perry, he wasn't in my group at that time.</p> <p>5 Q. Either way, was it your understanding</p> <p>6 that in counting points ratings from calendar</p> <p>7 year 2013 and 2014 are what counted?</p> <p>8 A. His does reflect that in the chart. So</p> <p>9 his D rating is calculated the same way as</p> <p>10 Suzette's is for that year.</p> <p>11 Q. Was it your understanding that you did</p> <p>12 not have to give comments for every employee?</p> <p>13 A. Yes.</p> <p>14 Q. Did you have to give comments where a 1</p> <p>15 or 5 was issued on a performance rating?</p> <p>16 A. I believe so.</p> <p>17 Q. But in addition to that you gave</p> <p>18 comments for others, though, what was that</p> <p>19 based on?</p> <p>20 A. I don't recall. This was in</p> <p>21 conjunction, like I didn't specifically fill</p> <p>22 this out, I worked with the HR person for this,</p> <p>23 and she requested information of me and I</p> <p>24 provided it.</p>
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<p>1 Q. It is different every month, right?</p> <p>2 A. Yes. So it identifies the year to</p> <p>3 date, is whatever the date was, it was the year</p> <p>4 to date number as of that date I was doing</p> <p>5 this.</p> <p>6 Q. Then her, I guess for her final</p> <p>7 performance review her year, was this her year</p> <p>8 to date in her final performance review, this</p> <p>9 8.4 versus 12.7?</p> <p>10 A. Of 2014, yes, that was her.</p> <p>11 Q. So for her year to date for 2014 it was</p> <p>12 pretty darn good, right?</p> <p>13 A. It was good.</p> <p>14 Q. David Perry, you put comments for him,</p> <p>15 right?</p> <p>16 A. In this Exhibit 2?</p> <p>17 Q. Yeah, on page 3.</p> <p>18 A. Yes.</p> <p>19 Q. He had a D rating on one of his</p> <p>20 evaluations, right?</p> <p>21 A. Yes, from the form I see, yes.</p> <p>22 Q. Why didn't you mention that in the</p> <p>23 comments area?</p> <p>24 A. Why didn't I mention that?</p>	<p>1 Q. Is that she Melissa Parker?</p> <p>2 A. Yes.</p> <p>3 Q. Is she located at 900 Race Street?</p> <p>4 A. No.</p> <p>5 Q. Did you provide her anything via email</p> <p>6 to make things easier?</p> <p>7 A. I may have.</p> <p>8 Q. Would they be in your delete folder or</p> <p>9 active folder?</p> <p>10 A. I don't know if they are there.</p> <p>11 Q. Would you be able to check though?</p> <p>12 A. I will check.</p> <p>13 Q. You said something about being able to</p> <p>14 check the delete folder for your stored monthly</p> <p>15 reports?</p> <p>16 A. Uh-huh.</p> <p>17 Q. How often do you delete your emails?</p> <p>18 A. Daily, but my email deletes don't go</p> <p>19 anywhere because it is under legal hold.</p> <p>20 Q. Now, are you familiar that</p> <p>21 interrogatories were propounded or sent in this</p> <p>22 case and there were certain responses given by</p> <p>23 Verizon?</p> <p>24 A. No.</p>

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<p style="text-align: right;">Page 137</p> <p>1 Q. Do you remember signing like a 2 verification? 3 A. Can I see that form? 4 Q. Sure. 5 (Whereupon verification was marked 6 for identification as Verizon-12.) 7 THE WITNESS: Yeah, I did sign 8 that, yes. 9 BY MS. BURKE: 10 Q. What did you understand that you were 11 signing off on when you signed this 12 verification? 13 A. It was whatever forms that I reviewed 14 in relation to that I said yes. This is what 15 this is stating. 16 Q. I am going to give you the 17 interrogatory that goes with that verification. 18 It is a lengthy document so I will point you to 19 a particular area. 20 (Whereupon defendants' responses to 21 plaintiff's interrogatories was marked 22 for identification as Verizon-13.) 23 THE WITNESS: When you said 24 interrogatories I should have asked</p>	<p style="text-align: right;">Page 139</p> <p>1 conversation about whether or not to proceed 2 with Ms. Walker as an impacted employee? 3 A. Yes, I would say I provided him the 4 name of who I selected. 5 Q. What was the nature of that discussion? 6 A. Just who the individual was and why I 7 made the selection. 8 Q. Did he respond or provide any feedback 9 to you? 10 A. I think from what I stated he said 11 okay. 12 Q. Did you give him a full rundown of why 13 you picked her or you just said I picked 14 Suzette Walker? 15 A. No, I gave him a rundown. 16 Q. At some point you actually verbally 17 told Ms. Walker that her position was being 18 impacted? 19 A. Yes. 20 Q. What did you tell her when you sat her 21 down? 22 A. I told her as I announced once we found 23 out there was a RIF, I told everyone there is a 24 RIF and the dates, and when she came in that</p>
<p style="text-align: right;">Page 138</p> <p>1 you, I didn't know what you were. 2 BY MS. BURKE: 3 Q. That is fine. 4 A. I thought you were talking about 5 something that I wasn't associated with. 6 Q. No, that is okay. These are a lengthy 7 document, but these were formal responses to 8 questions that were propounded by Ms. Walker 9 through her counsel. Initially there is a set 10 of legal objections. I am just going to point 11 your attention to one particular interrogatory, 12 and it is number 3, which starts on page 5, the 13 bottom of page 5. 14 A. Uh-huh, I am on page 5. 15 Q. So it seeks the identity of the 16 individuals who participated in the decision to 17 end Ms. Walker's employment, and then if you 18 look on page 6 in the response area there is a 19 legal objection made by your counsel, and then 20 it says Brian Magee and Joseph Muccilo 21 participated in the decision to end plaintiff's 22 employment with defendant. Do you see that? 23 A. Yes. 24 Q. Did you and Joe ever have a</p>	<p style="text-align: right;">Page 140</p> <p>1 morning I asked her to the office and told her 2 the RIF, today is the RIF day, and you are the 3 impacted employee. 4 Q. What else did you say, if anything? 5 A. I remember just talking through it. Is 6 there something for me to read? I don't recall 7 any big conversation, I just remember sitting 8 there with Suzette, impacted, and just 9 explaining what was going to happen. 10 Q. Explaining procedurally what would 11 happen next? 12 A. Right. 13 Q. Did you tell her why she was picked? 14 A. Specific of why she was picked? 15 Q. Yeah. 16 A. No, I don't think there was -- I don't 17 think it was requested. 18 Q. Did you tell her that the company was 19 going in a different direction? 20 A. I could have said the company, this is 21 something that I said to my team for the last 22 six, seven years that the company was changing, 23 we are no longer copper focused, we moved to a 24 fiber focus, and that is where we are at now.</p>

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<p>1 Q. Did you say that to her or you don't 2 know? 3 A. I said that was my normal talk of where 4 we are at. The technology has changed 5 everything. It is not any of our faults, it is 6 just the technology has changed. 7 MR. BARRAS: Can we go off the 8 record for a minute? 9 (Whereupon a discussion was held 10 off the record.) 11 BY MS. BURKE: 12 Q. We were talking earlier about the 13 initial conversation with Mucillo about the 14 fact that there was going to be a RIF and that 15 at some point later you learned that it would 16 have to be one person from your team? 17 A. Correct. 18 Q. Did that change at some point and there 19 was any suggestion by Muccilo that it did not 20 have to be someone from your team specifically? 21 A. Yes. 22 Q. When did that change? 23 A. Somewhere in that RIF period of, you 24 know, I would say near the end because there is</p>	<p>1 decide that she would be appropriate? 2 A. He gave me a name from his team. 3 Q. Who did he give you? 4 A. Ed McIntosh. 5 Q. Does he still work for Verizon? 6 A. No. 7 Q. Why not? 8 A. I believe there was a RIF package that 9 he took. I am not sure, it didn't impact my 10 team, but I believe he left under a RIF. 11 Q. How long after the April 2015 RIF? 12 A. That was in the fall of last year. 13 Q. 2015? 14 A. Yeah. 15 Q. Did he transition to another team than 16 Carl Gross's at some point? 17 A. Ed McIntosh was an engineer, and then 18 he left engineering and went to be a supervisor 19 of construction or maintenance, I forget which 20 one, and then after that he was a supervisor of 21 the DRC, which are the -- 22 Q. I know what they are. 23 A. Okay. 24 Q. Did he leave engineering voluntarily?</p>
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<p>1 like a 30 day notice to the employee. So 2 before that 30 day notice when we had to settle 3 on names, I was called and said you have to get 4 with Carl Gross because the number for Eastern 5 PA, Delaware is just one now, so you and Carl 6 have to come up with, you know, who should be 7 RIFd. 8 Q. How did you learn that information? 9 A. A phone call. 10 Q. Did you document it in any way? 11 A. No. 12 Q. Was it memorialized in an email at any 13 time? 14 A. No, not that I know of. 15 Q. At any point were you talking to either 16 Joe Muccilo or Carl Gross about the RIF and 17 potential perspective candidates to be impacted 18 via email? 19 A. No. 20 Q. Never? 21 A. I don't believe so. 22 Q. Did Gross actually give you a name of 23 someone that he had selected from his team or 24 did you both discuss Suzette Walker and just</p>	<p>1 A. When he went to become a supervisor? 2 Q. Yeah. 3 A. Yes. 4 Q. What did he do, an internal transfer of 5 some sort? 6 A. Yeah, he answered a job rec. 7 Q. Did you and Carl Gross or Salinsky or 8 Septak ever swap employees amongst your team? 9 A. Carl Gross and I have. 10 Q. For what reasons? 11 A. With other -- we've had people swap 12 between other teams. Septak and Salinsky are 13 in central and western PA, but people have 14 moved across districts before, across other 15 managers, it is not uncommon for people to move 16 between managers. 17 Q. You don't need a postal rec for that, 18 right? 19 A. Right. 20 Q. You just discuss it and then? 21 A. It is usually associated with either a 22 job function that is needed or, you know, 23 changes happening in the organization. 24 Q. Do you do it for developmental purposes</p>

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<p>1 as well?</p> <p>2 A. Yes.</p> <p>3 Q. So Muccilo shared with you that it</p> <p>4 didn't have to be someone on your team, it just</p> <p>5 had to be someone between you and Gross in</p> <p>6 Eastern?</p> <p>7 A. PA and Delaware, correct.</p> <p>8 Q. Did he rank his employees?</p> <p>9 A. I don't know.</p> <p>10 Q. So do you know if Ed McIntosh was</p> <p>11 allegedly picked as a result of being ranked in</p> <p>12 comparison to his team members?</p> <p>13 A. The only thing I know, we had a</p> <p>14 conversation, I asked Carl who his person was,</p> <p>15 told him who my person was, and we discussed,</p> <p>16 said that, you know, their merits, why they got</p> <p>17 to it, made it to the list.</p> <p>18 Q. Well, do you know if you ranked them or</p> <p>19 no?</p> <p>20 A. All I know is what he told me. He said</p> <p>21 he picked Ed McIntosh because he was the newest</p> <p>22 on his team. He felt like everyone on his team</p> <p>23 was, you know, great, and he felt Ed was</p> <p>24 great -- he just said he had no other way to</p>	<p>1 A. She is the IOF manager.</p> <p>2 Q. What does that mean?</p> <p>3 A. Interoffice facilities.</p> <p>4 Q. Does she oversee administrative staff?</p> <p>5 A. No, she oversees a team of engineers or</p> <p>6 planners. I would call them planners.</p> <p>7 Q. Are they Band 7T?</p> <p>8 A. They might be Vs.</p> <p>9 Q. T versus V is just a distinction of</p> <p>10 exempt versus non exempt; is that correct?</p> <p>11 A. Correct.</p> <p>12 Q. If you and I look at the rate and rank</p> <p>13 for your group, which was Verizon-2, it says</p> <p>14 completed by Melissa Parker. Do you see that?</p> <p>15 A. Yes, I did see that.</p> <p>16 Q. Did you even type any of this</p> <p>17 information into the comments area?</p> <p>18 A. I don't believe I typed any of that</p> <p>19 into the comments area, but it could have been</p> <p>20 a verbal. I think she interviewed me over the</p> <p>21 phone. I don't recall, and I will check if I</p> <p>22 sent her an email, like with it written out,</p> <p>23 but I know it wasn't in the system.</p> <p>24 I had a phone call with Melissa where</p>
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<p>1 split it.</p> <p>2 (Whereupon Bates stamp VZ Walker</p> <p>3 755 through 813 was marked for</p> <p>4 identification as Verizon-14.)</p> <p>5 BY MS. BURKE:</p> <p>6 Q. We are looking at Verizon-14. First of</p> <p>7 all, just for familiarity purposes these very</p> <p>8 first two pages which are Bates stamp Walker</p> <p>9 755 to 756, this business case.</p> <p>10 A. Right.</p> <p>11 Q. Are you familiar with this type of</p> <p>12 computer entry or this is not something you go</p> <p>13 into?</p> <p>14 A. This is not something I would see.</p> <p>15 Q. Turning to the next document in this</p> <p>16 exhibit, which is Bates stamp Walker 757.</p> <p>17 These ratings appear to be completed by Meghan</p> <p>18 Lose. Do you know who that is?</p> <p>19 A. Yes, I do.</p> <p>20 Q. Is she a representative of HR or</p> <p>21 manager?</p> <p>22 A. No, she is my counterpart, but she has</p> <p>23 a different function in our district.</p> <p>24 Q. What is that function?</p>	<p>1 she, you know, questioned me on everything and</p> <p>2 whether that was, she took that from our phone</p> <p>3 call or she asked me to email her information,</p> <p>4 I don't recall.</p> <p>5 I do recognize some of that to be my</p> <p>6 words, but then there is others in that that</p> <p>7 are not my words.</p> <p>8 Q. These are all in numerical order by a</p> <p>9 page standpoint, so if you flip to 762, please?</p> <p>10 A. Okay.</p> <p>11 Q. These all have business case numbers</p> <p>12 associated with them. Does the business case</p> <p>13 number even mean anything to you?</p> <p>14 A. Not to me.</p> <p>15 Q. You think that is an HR associated</p> <p>16 number, the RIF number?</p> <p>17 A. Yeah, right. I think that comes over</p> <p>18 to our team so that like my director and his</p> <p>19 staff person would probably, you know,</p> <p>20 intimately aware of that business case number</p> <p>21 but not me.</p> <p>22 Q. Just looking at some of these names,</p> <p>23 Linda Hauss, Steve Hunter, do you know who</p> <p>24 their supervisor is?</p>

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<p>1 A. Doug Smith. All these individuals are 2 planners. 3 Q. What area is he responsible for? 4 A. Pennsylvania, Delaware. 5 Q. Not just eastern or western but the 6 whole state? 7 A. Right. 8 Q. Can you please -- 9 A. And I don't know -- like I don't know, 10 you know, this is my first seeing it, I don't 11 know like the RIF person, I was treated as a 12 stovepipe compared to him. He was told I guess 13 a number, I was told a number. So I don't 14 know, like Doug has a different title than 15 mine. 16 Q. Okay. Can you go to 769, please? 17 A. Okay. 18 Q. Charles Browning, Fraer and Gaunt, do 19 you recognize whose team they are on? 20 A. Gary Smail. 21 Q. What position did these people hold? 22 A. They are provisioners. 23 Q. Band 7? 24 A. Yes. I would say they are Ts.</p>	<p>1 yeah, I guess. Yeah, that is his last name. 2 Just from looking, Brian Henry now works for me 3 so does Tim Lennon. It is Szewzyk, that is his 4 name. 5 Q. S-E-P-T-A-C-K? 6 A. No, that is Steve Septak. 7 Q. So this person, different geographic 8 region than you, Gross and Salinsky? 9 A. Jim Szewzyk, I hope I am saying the 10 names right, like he has the FTTP team, fiber 11 to the cell site team and Fios held orders. He 12 administers that state, both Pennsylvania and 13 Delaware at the time. He was responsible for 14 the overlay of the City of Philadelphia, which 15 in the start of this year that is what I 16 inherited, to finish that job. 17 Q. The people that we were looking at, 18 page 783, who was their supervisor at the time? 19 A. Jim Szewzyk. 20 MR. BARRAS: Do you want me to 21 spell it? 22 MS. BURKE: Yeah. 23 MR. BARRAS: S-Z-E-W-Z-Y-K. If I 24 can read this right.</p>
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<p>1 Q. Do you know who John Dedra is? 2 A. No, but I know Dedra Johns, maybe you 3 have it backwards. 4 Q. Yeah, who is that? 5 A. Dedra Johns worked in Philadelphia. 6 Q. Was she a single incumbent meaning 7 there is no one to compare her position to? 8 A. I would say yes. She didn't work for 9 me. I know she had a cube in the corner. 10 Q. Do you know who she worked for? 11 A. Cindy Sweppenheiser I believe. 12 Q. Do you know if Sweppenheiser supervised 13 anyone else? 14 A. Yes, she has a team of supervisors. 15 Q. But that is not the function that Dedra 16 Johns was performing? 17 A. Correct. 18 Q. Can you go to page 778, please. Okay, 19 that is self identified I don't need you to. 20 Page 783, are you there? 21 A. Yes. 22 Q. Feiler, Henry Westover, do you know 23 what team they are associated with? 24 A. At that time they were on Jim, no,</p>	<p>1 BY MS. BURKE: 2 Q. Do you know what geographic area he was 3 responsible for? 4 A. Pennsylvania, Delaware for those 5 functions I was given, like overlay of FTTP, 6 Fios held orders, fiber to the cell site. 7 Program management, like of programs he was in 8 charge of. 9 Q. Are these engineers? 10 A. Yes. 11 Q. If you go to page 789, June Hooks, are 12 these under McCoach, Janet Prince? 13 A. No, they are under Dawn Stampone. I am 14 almost positive it is under Dawn Stampone. 15 Q. 794 through 798 are all your team, so 16 if you could just go to page 801. Do you know 17 whose team these people are for, Broz, Hechler? 18 A. I am not sure. Just because like 19 movement of people from teams and since they 20 are western and central people. 21 Q. Page 805, these people, Messick, 22 McHugh, do you know who their team, their 23 supervisor? 24 A. This was Smail. So I could go back,</p>

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<p>1 are they from different times, the ones before?</p> <p>2 Q. All of these allegedly are from April</p> <p>3 23, 2015 or thereabouts.</p> <p>4 A. Okay. I am just saying based on the</p> <p>5 face of the documents.</p> <p>6 Q. If you go to 810, do you recognize any</p> <p>7 of these names Miller, Blodniker, Bushkirk?</p> <p>8 A. No, I don't recognize any of these</p> <p>9 names.</p> <p>10 Q. They are not Gross' team, are they?</p> <p>11 A. Joe Snyder I do recognize him and Mark</p> <p>12 Waselko, I dealt with them, they are Ron</p> <p>13 Salinsky's team.</p> <p>14 Q. He was part of the turf managers?</p> <p>15 A. Correct.</p> <p>16 Q. Were you told at any point from Joe</p> <p>17 Muccilo that you could also confer with</p> <p>18 Salinsky to see if anybody could be pulled from</p> <p>19 his team?</p> <p>20 A. No.</p> <p>21 Q. Salinsky's team, if you look at their</p> <p>22 locations, none of them were Philadelphia,</p> <p>23 correct?</p> <p>24 A. Right, they are central PA.</p>	<p>1 A. I don't.</p> <p>2 Q. What is Brian Henry doing for your</p> <p>3 team?</p> <p>4 A. Fiber to the print overlay of the City</p> <p>5 of Philadelphia.</p> <p>6 Q. Fiber to the what?</p> <p>7 A. Fiber to the print, the overlay of the</p> <p>8 City of Philadelphia clean up.</p> <p>9 Q. Is he an engineering specialist?</p> <p>10 A. Yes.</p> <p>11 Q. Band 7?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Tim Lennon, is he an engineer?</p> <p>14 A. Yes.</p> <p>15 Q. Band 7?</p> <p>16 A. Yes.</p> <p>17 Q. What is he doing for you?</p> <p>18 A. Fiber to the print, overlay, clean up</p> <p>19 City of Philadelphia.</p> <p>20 Q. When did they come over to your team,</p> <p>21 different times or the same time?</p> <p>22 A. Same time.</p> <p>23 Q. When was that?</p> <p>24 A. Beginning of this year.</p>
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<p>1 Q. So Septak and Gross, were they more</p> <p>2 closer to the area that you were responsible</p> <p>3 for?</p> <p>4 A. Gross, Carl Gross and I share eastern</p> <p>5 PA, Delaware, which used to be a turf, used to</p> <p>6 be a director turf.</p> <p>7 Q. How many employees did Gross have on</p> <p>8 his team at the time that you guys were</p> <p>9 conferring?</p> <p>10 A. I can't tell you that.</p> <p>11 Q. Septak, what location did he have?</p> <p>12 A. Western PA and former GTE.</p> <p>13 Q. I'm sorry, former what?</p> <p>14 A. GTE.</p> <p>15 Q. What is that?</p> <p>16 A. That was a company that Verizon</p> <p>17 purchased in the past and they still provide,</p> <p>18 you know, the former GTE provides, you know,</p> <p>19 telecom services in the geography.</p> <p>20 Q. Was Septak on the initial call when</p> <p>21 everybody was told that their team may be</p> <p>22 impacted by the RIF?</p> <p>23 A. Yes.</p> <p>24 Q. Do you know if he did a rate and rank?</p>	<p>1 Q. Have you gained, lost, traded anyone</p> <p>2 else in the list of people that we haven't</p> <p>3 talked about?</p> <p>4 A. So John Shubrook was on that list.</p> <p>5 Q. Let's go to Verizon-2 to make things</p> <p>6 easy, and if you go to the second to the last</p> <p>7 page. We will get to Shubrook in a minute, but</p> <p>8 from Scott Panichelli all the way down, are any</p> <p>9 of these individuals no longer on your team?</p> <p>10 A. No, they are all still on my team.</p> <p>11 Q. Then the next page, are all these</p> <p>12 individuals still on your team?</p> <p>13 A. No.</p> <p>14 Q. Who is not?</p> <p>15 A. John Shubrook.</p> <p>16 Q. Why not?</p> <p>17 A. He took a promotion to the IOF team in</p> <p>18 New Jersey.</p> <p>19 Q. Who's handling his turf?</p> <p>20 A. Right now Scott Panichelli and George</p> <p>21 Zang.</p> <p>22 Q. In addition to their prior</p> <p>23 responsibilities?</p> <p>24 A. Yes.</p>

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<p>1 Q. Anyone else on this list who is not on 2 your team anymore? 3 A. No. 4 Q. Was David Perry the newest person on 5 your team at the time of the RIF? 6 A. Yes. 7 Q. Was Anthony Portolese the second newest 8 at the time of the RIF? 9 A. I don't think I can answer it like that 10 because like the movement of people, Anthony 11 was an engineer, like I hired Anthony as a 12 college intern, so that is where he started. I 13 think he has close to 10 years now. He left 14 engineer to go to construction and then came 15 back. So I don't know if you are saying the 16 least amount of time in engineer or the least 17 amount of time under me. 18 Q. No, I mean like, for example, even 19 though Suzette's job entry date says 12/2012, 20 we know she was under you since at least 2004, 21 right? 22 A. No. 23 Q. 2008? 24 A. Right, 2008.</p>	<p>1 calculation of the amount of a performance 2 based increase is based on a formula of some 3 sort? 4 A. Now, no. What I know to be true is 5 your rating gives you a range that you could 6 achieve. 7 Q. Then do you identify what the person 8 will be compensated in terms of their increase? 9 A. I have say over that, yes. In that 10 range. 11 (Whereupon short term incentive 12 plan was marked for identification as 13 Verizon-15.) 14 BY MS. BURKE: 15 Q. We won't look at the first page that is 16 for Bands 5 and below. If you look at the last 17 page, Bates stamp 52, this is for Band 6 18 through 9. Are you familiar with this scale? 19 A. No, I have not seen this scale before. 20 Q. When you are determining what the 21 employee increase will be, do you understand 22 that there is a threshold that you can't go 23 below and a maximum that you can't go above? 24 A. Yes. There comes over to us, the</p>
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<p>1 Q. But, I mean, he didn't come back under 2 your supervision until 4/27/14, right? 3 A. Correct, correct. 4 Q. The exhibit we looked at a minute ago, 5 Verizon-14 did you ever look at any of these 6 rate and rank documents or is this the first 7 time you have seen them? 8 A. First time I have seen them. 9 Q. Did you have to put requisition numbers 10 out for Henry or Lennon or did they just 11 transfer in? 12 A. They just transferred in. 13 Q. Are they Engineering III Specialists? 14 A. Yes, they are the same title. Everyone 15 under me has the same title. 16 Q. You talked earlier, and it is my 17 understanding that performance based pay 18 increases are based on a formula of some sort; 19 is that correct? 20 A. I don't recall saying that. 21 Q. That a performance evaluation could 22 impact someone's compensation? 23 A. That is true. 24 Q. Is it your understanding that the</p>	<p>1 employees fund it for a certain percent, and 2 then we have to keep within that fund, I have 3 to keep within my budget for my team and then 4 in the ranges of everyone, because some people 5 can't get more than a certain amount. So, 6 yeah, it is just that I have never seen this 7 out. I get to see mine, I never know what my 8 target or maximum will be, so now I can tell 9 whether I get a good raise or not now, thank 10 you. 11 (Whereupon Bates stamp Def Walker 12 28 through 48 was marked for 13 identification as Verizon-16.) 14 BY MS. BURKE: 15 Q. This is compensation information for 16 Suzette Walker. Are you familiar with these 17 screen shots of the computer system or no? 18 A. In this format, no. 19 Q. Were you aware that she received a pay 20 increase as of March 2015, March 29th? 21 A. Yes, based upon 2016 performance, yes. 22 Q. So her salary increased from 90,834 to 23 93,560. What role did you play in determining 24 that percentage, which is roughly 4 percent or</p>

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<p>1 less?</p> <p>2 A. I would say a direct role.</p> <p>3 Q. What did you use to determine how low</p> <p>4 you could go, how high you could go?</p> <p>5 A. It would have been in the range that</p> <p>6 was available to her, and then what my budget</p> <p>7 was to spend.</p> <p>8 Q. Because of the five given to Tom Hodge</p> <p>9 did he get to your recollection a pretty high</p> <p>10 salary increase that year?</p> <p>11 A. Yes, he had a bigger range because of</p> <p>12 his rating.</p> <p>13 Q. Over the course of Ms. Walker's years</p> <p>14 with you there were periods of time where her</p> <p>15 rate of pay did not change for several years,</p> <p>16 was that because there was no funding to do</p> <p>17 that or for other reasons.</p> <p>18 A. I don't recall unless they are from a</p> <p>19 rating, like no change in the person's pay,</p> <p>20 that is unusual. I don't recall that. Like</p> <p>21 the only time that I would say she wouldn't</p> <p>22 have gotten a raise would have been with the</p> <p>23 development rating.</p> <p>24 Q. Can you go back to exhibit Verizon-1,</p>	<p>1 March time frame.</p> <p>2 So like you don't show March, I am</p> <p>3 saying in February it has been communicated to</p> <p>4 her what her raise is going to be, but we don't</p> <p>5 see it on this sheet until the November</p> <p>6 showing.</p> <p>7 I know from the supervisor, you know,</p> <p>8 the supervisor had a bigger range and you</p> <p>9 could, you know, move a person up faster than</p> <p>10 you could as an engineer.</p> <p>11 Q. There is two additional spreadsheets</p> <p>12 that I just want to ask you about quickly.</p> <p>13 This one is probably easier, 8/18 to look at</p> <p>14 first. This is just a laundry list of head</p> <p>15 count of individuals in Joe Mucillo's</p> <p>16 organization. I don't believe I need to ask</p> <p>17 you anything about this particular one.</p> <p>18 Finally, this one you can speak to. If</p> <p>19 you go to 816. Are you with that spreadsheet?</p> <p>20 Do you recognize what that is, Bates stamp 816,</p> <p>21 that spreadsheet? Are you in the by engineer</p> <p>22 tab?</p> <p>23 A. Yes.</p> <p>24 Q. So if you go by engineer and we go down</p>
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<p>1 please. Can you look at the base salary areas</p> <p>2 and just let me know if you think that is</p> <p>3 inaccurate or if there are situations where you</p> <p>4 don't have the discretion to give increases to</p> <p>5 your team overall because of finances that</p> <p>6 year?</p> <p>7 A. Could you point out a year that you are</p> <p>8 referencing on this sheet?</p> <p>9 Q. So if you look as an example, March</p> <p>10 2010 she is at 77 and some change and she stays</p> <p>11 at that rate up through February 2011.</p> <p>12 A. So she wouldn't have had a raise yet in</p> <p>13 February of 2011. When you see that November</p> <p>14 number in 2011 where she has 82,000 and she got</p> <p>15 a \$5,000 raise, approximately.</p> <p>16 Q. Why in November, though?</p> <p>17 A. Well, no, just because your, for</p> <p>18 whatever reason the effective date she would</p> <p>19 have got it in March, it is just being</p> <p>20 reflected.</p> <p>21 It is always late out in the year when</p> <p>22 your raise would come and when you get the</p> <p>23 bonus. You get the bonus first and the raise</p> <p>24 comes later. The raise usually comes in that</p>	<p>1 to you, are you familiar with this chart?</p> <p>2 A. Yeah, this would have been end of year</p> <p>3 2014.</p> <p>4 Q. Do you know what year this is?</p> <p>5 A. Yeah, I would say it is end of year.</p> <p>6 Wait, yeah, 2014, end of year 2014.</p> <p>7 Q. What are you gauging that by?</p> <p>8 A. The reports changed to that format we</p> <p>9 saw earlier in 2015. I like this report</p> <p>10 better.</p> <p>11 Q. If you look at Suzette Walker, it looks</p> <p>12 like that 8.4 is what was contained on her end</p> <p>13 of year evaluation, right?</p> <p>14 A. Right, I was using the number, the</p> <p>15 volume 802, so that is a full year of SRs, like</p> <p>16 I know the volume number.</p> <p>17 Q. So the blue number up top next to the</p> <p>18 12.7 is that the team average?</p> <p>19 A. That would be team average, yes.</p> <p>20 Q. Then Q code time, what is that?</p> <p>21 A. Q code time is when the SR comes in it</p> <p>22 could get Q code, like a problem code saying</p> <p>23 customer is not calling me back, the SR has an</p> <p>24 error on it so I can't process it. So we would</p>

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<p>1 measure like that time because, you know, it 2 would be, the longer it is on Q code is going 3 to affect your overall time. 4 Q. So is it better to be below average on 5 average of total Q time? 6 A. Yes. 7 Q. So it was good if you were below 10.7? 8 A. Yes. 9 Q. Average of facility billed, was it good 10 to be above or below the 32.1? 11 A. They didn't have any impact on that. 12 It is not a measure for them. 13 Q. What about average of total SR to 14 build? 15 A. Again, the part that the engineers have 16 to play would be the first and the second. The 17 others measuring the construction and the total 18 length of time that was open, and I believe 19 that is why he changed this report in 2015 to 20 drop those things out. 21 Q. The account of SR, that is total 22 amount, 802, that is not an average, right? 23 A. Correct. 24 Q. The actual number, that can't be</p>	<p>1 construction team. So I think Jim's report, 2 the average facility billed is more important 3 to them, but his report is pulling everything 4 at once. So like the construction managers 5 would just care about column D because that is 6 the facility build from the time engineering is 7 giving it to them, that is how long it is 8 taking them to build it. 9 Q. This is not reflective of your actual 10 employee's performance, this tab? 11 A. It is the same information, it is just 12 geared towards the construction team instead of 13 engineering team. 14 Q. Right. Your director is not even in 15 this tab, right? 16 A. Right. 17 Q. By service type I see you are here in 18 each area? 19 A. Right. I was referring to this earlier 20 on the report, I made mention to DS1, DS3, 21 Ethernet, OCN, they are all different classes 22 of service. 23 Q. This is just telling you how you size 24 up in comparison to your other engineering</p>
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<p>1 indicative of their particular performance, for 2 example, this gentleman, James Parks, who had a 3 six, right? 4 A. He passed away during the year so I 5 didn't hold it against him. 6 Q. What about Tomasse with a 10, is that 7 because he was the intern? 8 A. Intern. 9 Q. What about David Perry with 20? 10 A. His half year contribution. 11 Q. What do you mean half year? 12 A. Well, in 2014 is when he came. 13 Q. So this particular report we have for 14 2014, you have one for 2013 too, right? 15 A. I don't know. I don't recall what the 16 reports looked like in 2013. 17 Q. But Suzette Walker's numbers wouldn't 18 be reflected on there because she was doing 19 conduit work, right? 20 A. Correct. 21 Q. Are you able to go to by CSX director. 22 So that is just scoring you as a manager under 23 directors? 24 A. No, I think CXN would be the</p>	<p>1 managers? 2 A. Correct, in each of those categories. 3 Q. Got it. What does the SR build 4 intervals reflect? 5 A. This is the raw data that you use to 6 pull the -- these are each of the managers so 7 there is my name, so this is my team, and you 8 see the month of April, so that is the data 9 from April. 10 It is each month's data that he used to 11 create that because you would get, you know, 12 the engineer would say wait a second this isn't 13 right so he would have the data there. So this 14 would be going out to them also. 15 Q. Is there even a way to associate that 16 data with a particular engineer, is it just 17 based on town? 18 A. The central office. So he has an 19 engineer column. 20 Q. Now, this is what I was asking you 21 earlier, where it says design engineer in area 22 O, would that tell me who actually designed it 23 or whether it was Suzette Walker or her 24 contractor or would her name always be in that</p>

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<p>1 column because she is the engineer responsible</p> <p>2 for that turf?</p> <p>3 A. She is the engineer responsible for it.</p> <p>4 Q. This is the underlying raw data for the</p> <p>5 tab of by service, by engineer?</p> <p>6 A. By engineer.</p> <p>7 Q. Okay.</p> <p>8 (Whereupon corporate technology and</p> <p>9 network functional capabilities was</p> <p>10 marked for identification as</p> <p>11 Verizon-17.)</p> <p>12 BY MS. BURKE:</p> <p>13 Q. I am handing you Verizon-17. Can you</p> <p>14 look at this document and let me know if you</p> <p>15 recognize any of these documents at all?</p> <p>16 A. Yes.</p> <p>17 Q. What are they, let's start with the</p> <p>18 first page?</p> <p>19 A. This I recall, this was all part of the</p> <p>20 package to fill out the graph from what I</p> <p>21 remember.</p> <p>22 Q. For the RIF?</p> <p>23 A. Yes.</p> <p>24 Q. Was this just for the engineering</p>	<p>1 proficiency levels when you ranked your</p> <p>2 employees?</p> <p>3 A. I don't recall doing that.</p> <p>4 Q. Because I saw you use the term, when</p> <p>5 you talk about Tom Hodge you said his net</p> <p>6 knowledge is advanced or you refer to someone</p> <p>7 as an expert. Is that just general terminology</p> <p>8 you are used to from rating your employees or</p> <p>9 did you actually have to put them in categories</p> <p>10 pursuant to this list here on page 026?</p> <p>11 A. To be honest with you, page 026 I am</p> <p>12 having trouble reading.</p> <p>13 Q. At the very bottom there it says</p> <p>14 functional proficiency levels, and it labels</p> <p>15 them expert, advanced, applying, learning,</p> <p>16 limited, not applicable, and then it gives an</p> <p>17 explanation for each. Do you want me to read</p> <p>18 you the explanation?</p> <p>19 A. I don't think that they need to write</p> <p>20 anything. Where you are seeing that, I think</p> <p>21 those are my words.</p> <p>22 Q. This last page, this is not applicable</p> <p>23 to any of your employees at the time of the</p> <p>24 RIF, right, none of them were Band 7</p>
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<p>1 department?</p> <p>2 A. I don't know. This is what I received.</p> <p>3 Q. If you go to the second page, is this</p> <p>4 also a part of the packet you received in order</p> <p>5 to assess, rate and rank your employees?</p> <p>6 A. Yes.</p> <p>7 Q. Did you make any handwritten notes or</p> <p>8 anything? I am just being repetitive for</p> <p>9 completeness purposes when you would use these</p> <p>10 charts.</p> <p>11 A. No.</p> <p>12 Q. At the time that you performed your</p> <p>13 rate and rank it was for Band 7T Engineering</p> <p>14 III Specialists?</p> <p>15 A. Yes.</p> <p>16 Q. The bottom there, functional</p> <p>17 proficiency level, expert, advanced, applying,</p> <p>18 learning, limited or not applicable, did you</p> <p>19 rank your employees as to those categories?</p> <p>20 A. Which page are you on?</p> <p>21 Q. 026.</p> <p>22 A. Could you repeat your question?</p> <p>23 Q. These expert, advance, applying,</p> <p>24 learning, did you use these functional</p>	<p>1 supervisors?</p> <p>2 A. That's correct.</p> <p>3 Q. Is there anything specific about the</p> <p>4 conversation that you had with Carl Gross that</p> <p>5 you can recall and share right now, about whose</p> <p>6 team's employees would be impacted since it</p> <p>7 only needed to be one?</p> <p>8 A. Besides what I said, I remember him</p> <p>9 saying, how he selected it, asked okay, what</p> <p>10 are the items that brought him to this list,</p> <p>11 and then we both used personal knowledge of</p> <p>12 each person. We both are very familiar with</p> <p>13 both of those individuals.</p> <p>14 Q. Gross did not supervise Walker,</p> <p>15 correct?</p> <p>16 A. No, but he worked with Suzette Walker.</p> <p>17 Q. In the field or in the office?</p> <p>18 A. In the office, engineering.</p> <p>19 Q. Did he ever assist you in completing</p> <p>20 any of her performance evaluations?</p> <p>21 A. No.</p> <p>22 Q. Did he express concerns to you about</p> <p>23 the time period that Ms. Walker was out of the</p> <p>24 office when she was trying to do the conduit</p>

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<p>1 role?</p> <p>2 A. No.</p> <p>3 Q. Because of a medical leave?</p> <p>4 A. No.</p> <p>5 Q. Did he give you specific reasons why he</p> <p>6 thought Walker should go versus Ed McIntosh?</p> <p>7 A. No.</p> <p>8 Q. Or did you give him specific reasons</p> <p>9 why?</p> <p>10 A. Well, I gave the reasons why I thought</p> <p>11 Suzette should, he gave his for Ed Mac. We</p> <p>12 just talked about, you know, what both of them</p> <p>13 bring to the team and going forward what is the</p> <p>14 best, and I made the decision.</p> <p>15 I felt as though if that was my team,</p> <p>16 which one day that all could be my team, Carl</p> <p>17 Gross's area, the way things are going I felt</p> <p>18 like what is the best team for me.</p> <p>19 Q. So because you both had a general basis</p> <p>20 to go from, did you discuss specifics or did he</p> <p>21 just go with your judgement when you</p> <p>22 recommended that it be Suzette?</p> <p>23 A. I went through specifics.</p> <p>24 Q. Did you give any specifics beyond what</p>	<p>1 had knowledge of the actual construction of</p> <p>2 some, which was a benefit to me.</p> <p>3 Q. When he got the 1 on his performance</p> <p>4 review do you know what job function he was</p> <p>5 performing?</p> <p>6 A. Supervisor.</p> <p>7 Q. Of what?</p> <p>8 A. He had customer ops, which was like the</p> <p>9 maintenance organization.</p> <p>10 Q. Who was the employee who was out for a</p> <p>11 prolonged period that you thought George Zang</p> <p>12 was helpful in stepping up to the plate?</p> <p>13 A. James Parks.</p> <p>14 Q. James Parks?</p> <p>15 A. Yes.</p> <p>16 Q. Not on your team?</p> <p>17 A. No, he was on my team. He is the one</p> <p>18 that I said passed away earlier.</p> <p>19 Q. Oh, okay, thank you. In David Perry's</p> <p>20 performance evaluation in his mid year, if you</p> <p>21 just gave him in the summary area average of</p> <p>22 Fac Verification, would that be his average,</p> <p>23 the team's average?</p> <p>24 A. Am I able to see?</p>
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<p>1 is contained in Verizon-2, the comment section</p> <p>2 for Suzette?</p> <p>3 A. I think that kind of covers what I</p> <p>4 talked about.</p> <p>5 Q. Dave Perry was still gaining knowledge</p> <p>6 of the request of high bandwidth too, right?</p> <p>7 A. Yes.</p> <p>8 Q. You thought he still needed to expand</p> <p>9 his knowledge of the HBW service and the design</p> <p>10 of those orders, right?</p> <p>11 A. Yes.</p> <p>12 Q. Did you think he might grasp that more</p> <p>13 quickly than Suzette?</p> <p>14 A. No, I think I put them as even in that.</p> <p>15 I felt that he brought something additional to</p> <p>16 the table that Suzette didn't bring to the</p> <p>17 table.</p> <p>18 Q. What was it?</p> <p>19 A. His experience in the field, he was a</p> <p>20 splicer from associate and then he was a</p> <p>21 foreman, and I felt like he was bringing the</p> <p>22 most up-to-date knowledge to what the field is</p> <p>23 doing today.</p> <p>24 So I felt like, yeah, I felt like he</p>	<p>1 Q. Yeah, it is page 326, under the</p> <p>2 performance evaluations, it is a PDF,</p> <p>3 comparative performance evaluations, if you</p> <p>4 scroll to page 326.</p> <p>5 A. Right, they are straight, all those, I</p> <p>6 believe all those are the average for our --</p> <p>7 yeah, so I wrote it, the above numbers give you</p> <p>8 an idea of measurable, the item that is the</p> <p>9 hottest for the facility verification to be</p> <p>10 complete within eight days, you have solid</p> <p>11 experience you just need to learn the</p> <p>12 engineering systems and process flows. I would</p> <p>13 like that you are asking questions and take</p> <p>14 advantage of other engineers to gain</p> <p>15 experience. So what I wrote, the numbers, that</p> <p>16 is where our team was at mid year.</p> <p>17 Q. But his, we would have to look at the</p> <p>18 report, the monthly report?</p> <p>19 A. I think he came like right in that June</p> <p>20 time period. The end of May maybe he came.</p> <p>21 Q. 5/25/2014 job entry date sound about</p> <p>22 right?</p> <p>23 A. Yeah, sounds.</p> <p>24 Q. Have you ever issued any corrective</p>

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<p>1 action to any of your engineers?</p> <p>2 A. No.</p> <p>3 Q. Why was Perry brought over to your team</p> <p>4 in May of 2014?</p> <p>5 A. There was an opening, I forget the end</p> <p>6 result of how it came because there was a lot</p> <p>7 that was going on. I remember, I think someone</p> <p>8 left from my team, I had the opening for, but</p> <p>9 in the end Carl and I were interviewing people</p> <p>10 because I had an opening, he had an opening and</p> <p>11 then however it transpired I lost my opening</p> <p>12 that I did not have an opening any longer.</p> <p>13 So Carl had one, and he made an offer</p> <p>14 to someone and then that person's manager said</p> <p>15 he wasn't releasable so Carl needed a person,</p> <p>16 and one of my worker, Alex Ramos, had just</p> <p>17 moved out of the City of Philadelphia and said</p> <p>18 could I go to Carl's area because he was paying</p> <p>19 city wage tax and thought, you know, it ended</p> <p>20 up being a good move for him. Yeah, city wage,</p> <p>21 and Carl's group now works from home so it</p> <p>22 really worked out for him.</p> <p>23 Q. When did Ramos leave your team?</p> <p>24 A. I would have to.</p>	<p>1 whatever the other change was, whichever one</p> <p>2 this replaced would have had Ramos on it.</p> <p>3 Q. But you still have that one that had</p> <p>4 Ramos on it, right?</p> <p>5 A. I am sure I do.</p> <p>6 Q. Do you keep like a list of your team</p> <p>7 members, phone numbers or something that would</p> <p>8 show who the people were on your team at any</p> <p>9 given time?</p> <p>10 A. I keep, I update a sheet like this</p> <p>11 whenever there is a change on my team. So this</p> <p>12 is my -- I made this sheet.</p> <p>13 Q. But if you look at the first page,</p> <p>14 though, it doesn't even show everybody on your</p> <p>15 team, would that show if someone was added or</p> <p>16 subtracted?</p> <p>17 A. This shows everyone that is on the</p> <p>18 Delaware team, and the next one shows everyone</p> <p>19 that was on the eastern PA and Philadelphia</p> <p>20 team.</p> <p>21 Q. Do you keep these in an electronic</p> <p>22 folder somewhere or a hard folder?</p> <p>23 A. Electronic. Just so you can mark on</p> <p>24 your sheet, Sam Reinhardt is a contractor, just</p>
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<p>1 Q. When in connection with David Perry</p> <p>2 coming in?</p> <p>3 A. So Carl gave me his rec from Alex going</p> <p>4 over, so I held Alex until Dave came in. I</p> <p>5 would say Alex transferred to Carl's after a</p> <p>6 couple of weeks of Dave being here.</p> <p>7 Q. The organizational charts that you</p> <p>8 shared, just for these brief intervals January</p> <p>9 2014 and July of 2014, Verizon-4, that you</p> <p>10 created. Do you have them stored somewhere?</p> <p>11 A. Yes.</p> <p>12 Q. Where do you keep them?</p> <p>13 A. On my computer. Alex came to me</p> <p>14 through another consolidation, and I got that</p> <p>15 responsibility and then, yeah, Alex left the</p> <p>16 City, and that opened up this spot for me to</p> <p>17 hire someone, and that was Dave Perry. What</p> <p>18 number was that?</p> <p>19 Q. Verizon-4.</p> <p>20 A. So the Delaware one, the earlier one</p> <p>21 from this July would have been -- had Alex</p> <p>22 Ramos on it.</p> <p>23 Q. July?</p> <p>24 A. This is July 7, 2014, so I would say</p>	<p>1 in case, if you are looking at that on the</p> <p>2 front page of Delaware.</p> <p>3 Q. He had an entire turf?</p> <p>4 A. Yes, that was from -- with James being</p> <p>5 out I had to put him in. He came in, you know,</p> <p>6 he was a retiree came in to help out with James</p> <p>7 being out.</p> <p>8 Q. Do you know who Matt Carey?</p> <p>9 A. He works for Cindy Sweppenheiser.</p> <p>10 Q. The same supervisor over Dedra Johns?</p> <p>11 A. Correct, Cindy is a manager.</p> <p>12 Q. Right. What does Matt do?</p> <p>13 A. Third party like administration.</p> <p>14 Q. Similar to what Dedra Johns is doing?</p> <p>15 A. I don't know what Dedra did in the end,</p> <p>16 I honestly don't.</p> <p>17 Q. After Ed McIntosh accepted, according</p> <p>18 to your testimony, a RIF package did he work in</p> <p>19 any other capacity for Verizon after that?</p> <p>20 A. Not -- I'm sorry, I hear he is working</p> <p>21 for a contract company now.</p> <p>22 Q. Do you know one way or the other</p> <p>23 whether or not he accepted another position</p> <p>24 with Verizon after he took the RIF package?</p>

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<p style="text-align: right;">Page 181</p> <p>1 A. No, I know he doesn't work for Verizon 2 core. He works for a company, a contract 3 company that does work. 4 Q. I don't have any further questions, 5 counsel may have follow up and he may not. 6 MR. BARRAS: No, nothing. 7 ----- 8 (Witness excused.) 9 (Deposition concluded at 5:04 p.m.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	
<p style="text-align: right;">Page 182</p> <p>1 CERTIFICATION 2 3 I, Linda A. Ricciardi, hereby 4 certify that the foregoing is a true and 5 accurate transcript of the deposition of BRIAN 6 MAGEE, who was first sworn by me at the time, 7 place and on the date herein before set forth. 8 I further certify that I am 9 neither attorney nor counsel for, not related 10 to or employed by any of the parties to the 11 action in which this deposition was taken; 12 further, that I am not a relative or employee 13 of any attorney or counsel employed in this 14 case, nor am I financially interested in this 15 action. 16 17 18 19 20 21 _____ 22 Linda A. Ricciardi 23 Court Reporter and Notary Public 24</p>	

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Exhibit F

Condensed Transcript
Testimony of:

JOSEPH MUCCILO

Date: August 24, 2016

Suzette Walker v. Verizon Services Corporation, et al.

No.: USDC E.D.PA 15-4031

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JOSEPH MUCCILO

Pages 1 to 4

<p style="text-align: right;">1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p>3 * * *</p> <p>4 SUZETTE WALKER :</p> <p> :</p> <p>5 v. :</p> <p> :</p> <p>6 VERIZON SERVICES CORPORATION :</p> <p> :</p> <p>7 VERIZON PENNSYLVANIA, INC. : NO. 15-4031</p> <p>8</p> <p>9 * * *</p> <p>10 August 24, 2016</p> <p>11 * * *</p> <p>12</p> <p>13 Oral deposition of JOSEPH MUCCILO,</p> <p>14 held in the Law Offices of Karpf, Karpf &</p> <p>15 Cerutti, PC, 3331 Street Road, Two Greenwood</p> <p>16 Square, Suite 128, Bensalem, Pennsylvania</p> <p>17 19020, commencing at 2:12 p.m., on the above</p> <p>18 date, before Hope Agosto, a Professional Court</p> <p>19 Reporter and a Notary Public.</p> <p>20</p> <p>21 * * *</p> <p>22 R&K REPORTING</p> <p>23 Court Reporting Services</p> <p>24 PO Box 1372</p> <p> Levittown, Pennsylvania 19058-1372</p> <p> Phone (215) 946-7009 Fax (215) 949-1867</p>	<p style="text-align: right;">3</p> <p>1 * * *</p> <p>2 INDEX</p> <p>3 * * *</p> <p>4 WITNESS PAGE NO.</p> <p>5 JOSEPH MUCCILO 4</p> <p>6 By Ms. Burke</p> <p>7</p> <p>8 * * *</p> <p>9 EXHIBITS</p> <p>10 * * *</p> <p>11 NO. DESCRIPTION PAGE NO.</p> <p>12 Muccilo-1 1/22/15 Email from Fowler re: 12</p> <p> RE: EWAs from 2 weeks ago,</p> <p>13 Not on list today</p> <p>14 Muccilo-2 1/21/15 Email from Lippincott 15</p> <p> Re: Work Stoppage Retainees -</p> <p>15 We need to release more people</p> <p>16 To an EWA - need respond ASAP</p> <p> please</p> <p>17 Muccilo-3 3/23/15-3/26/15 Email Chain re: 16</p> <p> May Planning - Spreadsheet</p> <p>18 Muccilo-4 3/23/15-3/26/15 Email Chain re: 26</p> <p>19 May Planning - Spreadsheet</p> <p>20 Muccilo-5 3/20/15-3/26/15 Email Chain re: 32</p> <p> May Planning - Spreadsheet</p> <p>21 Muccilo-6 4/15/15-4/16/15 Email Chain re: 45</p> <p>22 FW: Pls Review: Headcount</p> <p>23 Muccilo-7 2/4/15 Email Chain re: 61</p> <p>24</p>
<p style="text-align: right;">2</p> <p>1 A P P E A R A N C E S:</p> <p>2</p> <p>3 KARPF, KARPf & CERUTTI, PC</p> <p>4 BY: CHRISTINE E. BURKE, ESQUIRE</p> <p> 3331 Street Road</p> <p>5 Two Greenwood Square</p> <p> Suite 128</p> <p>6 Bensalem, Pennsylvania 19020</p> <p> (215) 639-0801</p> <p>7 CBurke@karpf-law.com</p> <p>8 -- Counsel for the Plaintiff</p> <p>9</p> <p>10 REED SMITH, LLP</p> <p>11 BY: JOEL S. BARRAS, ESQUIRE</p> <p> Three Logan Square</p> <p>12 1717 Cherry Street</p> <p> Suite 3100</p> <p> Philadelphia, Pennsylvania 19103</p> <p>13 (215) 241-7990</p> <p>14 JBarras@reedsmith.com</p> <p>15 -- Counsel for the Defendants</p> <p>16 A L S O P R E S E N T:</p> <p>17 HARVETTA NERO, ESQUIRE</p> <p>18 -- Assistant General Counsel, Verizon</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">4</p> <p>1 * * *</p> <p>2 (It is hereby stipulated and</p> <p>3 agreed by and between counsel for the</p> <p>4 respective parties that the signing,</p> <p>5 sealing, filing and certification are</p> <p>6 waived; and that all objections, except</p> <p>7 as to the form of the question, be</p> <p>8 reserved until the time of trial.)</p> <p>9 * * *</p> <p>10 JOSEPH MUCCILO, after having been</p> <p>11 first duly sworn, was examined and</p> <p>12 testified as follows:</p> <p>13 * * *</p> <p>14 EXAMINATION</p> <p>15 * * *</p> <p>16 BY MS. BURKE:</p> <p>17 Q. Mr. Muccilo, I introduced myself in</p> <p>18 the lobby earlier. I represent Suzette Walker</p> <p>19 in a civil lawsuit that she has against Verizon</p> <p>20 and I'm here to take your deposition based on</p> <p>21 the nature of your position at the time and you</p> <p>22 have been identified by both parties as a</p> <p>23 witness who may have some information related</p> <p>24 to the claims and defenses.</p>

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JOSEPH MUCCILO

Pages 5 to 8

<p style="text-align: right;">5</p> <p>1 A. Yep.</p> <p>2 Q. Have you ever had your deposition</p> <p>3 taken before?</p> <p>4 A. No.</p> <p>5 Q. I only ask so that I can give you</p> <p>6 some clear instructions for the process. It's</p> <p>7 under oath and this is a formal court</p> <p>8 proceeding. Do you understand that?</p> <p>9 A. Yes.</p> <p>10 Q. Even though we're sitting in a</p> <p>11 conference room?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Hope is our court reporter. She's</p> <p>14 typing every single thing that you say. No</p> <p>15 matter what you say, just make sure your</p> <p>16 response is truthful and that it's verbal. So</p> <p>17 when you say uh-huh to me, I understand what</p> <p>18 you're saying right now, but then there might</p> <p>19 be a problem at the later date. All right?</p> <p>20 A. Got it.</p> <p>21 Q. You're represented by counsel today,</p> <p>22 correct?</p> <p>23 A. Yes.</p> <p>24 Q. He's probably going to make a number</p>	<p style="text-align: right;">7</p> <p>1 break at some point, you can do that. Just</p> <p>2 answer the question that's pending before you</p> <p>3 leave the room. All right?</p> <p>4 A. Got it.</p> <p>5 Q. Is there any reason before we get</p> <p>6 started that you think you can't give truthful</p> <p>7 and accurate testimony?</p> <p>8 A. No.</p> <p>9 Q. Mr. Muccilo, are you currently</p> <p>10 employed with Verizon?</p> <p>11 A. Yes.</p> <p>12 Q. What's your role right now?</p> <p>13 A. I'm the director of engineering for</p> <p>14 Pennsylvania and Delaware.</p> <p>15 Q. How long has that been true for?</p> <p>16 A. I started it was right around the end</p> <p>17 of February 2014, I think that's when I got</p> <p>18 moved into the position.</p> <p>19 Q. Were you promoted into that role?</p> <p>20 A. Yes.</p> <p>21 Q. What was your most recent title</p> <p>22 before that promotion?</p> <p>23 A. I was an engineering manager within</p> <p>24 the -- what we call the video and in-home</p>
<p style="text-align: right;">6</p> <p>1 of objections because he take issue with the</p> <p>2 way I ask the question. Number one, let him</p> <p>3 put his objection on the record so that he can</p> <p>4 identify what he needs to say and then just</p> <p>5 stop testifying at that point because our court</p> <p>6 reporter can only type down what one person is</p> <p>7 saying at a time. Sometimes she'll try to do</p> <p>8 both but it's very difficult. Most often</p> <p>9 you'll be able to the answer the question even</p> <p>10 if there's an objection made, but he'll give</p> <p>11 you instruction if there's some reason he</p> <p>12 doesn't want you to answer a question. Okay?</p> <p>13 A. Okay.</p> <p>14 Q. If you don't understand a question</p> <p>15 that I ask you, make sure that you let me know,</p> <p>16 or it's confusing or ambiguous in some way or</p> <p>17 you just don't know what it is that I'm asking.</p> <p>18 All right?</p> <p>19 A. Okay.</p> <p>20 Q. Because if you answer the question,</p> <p>21 I'll assume that you understood what it was</p> <p>22 that I was asking. I'm going to try to be</p> <p>23 efficient with your deposition and get through</p> <p>24 these documents quickly, but if you need a</p>	<p style="text-align: right;">8</p> <p>1 network.</p> <p>2 Q. Your responsibilities totally changed</p> <p>3 when you got the promotion, right?</p> <p>4 A. Yes.</p> <p>5 Q. Once you became the director of</p> <p>6 engineering for the Pennsylvania and Delaware</p> <p>7 area, did you report to the executive director?</p> <p>8 A. Yes, I did.</p> <p>9 Q. Was that Bill Bragg at the time?</p> <p>10 A. Yes.</p> <p>11 Q. Or William?</p> <p>12 A. That's correct.</p> <p>13 Q. Is that still true through today?</p> <p>14 A. No.</p> <p>15 Q. When did that change?</p> <p>16 A. It was I want to say around the</p> <p>17 second half of 2015, I think.</p> <p>18 Q. Sometime after at least June of 2015?</p> <p>19 A. Yeah, I think it was right around</p> <p>20 that time.</p> <p>21 Q. Was it after the RIF at issue for</p> <p>22 Suzette Walker occurred in the spring of 2015?</p> <p>23 A. I believe I was still working for</p> <p>24 Bill at that time.</p>

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Pages 9 to 12

<p style="text-align: right;">9</p> <p>1 Q. I'm just trying to get clarification</p> <p>2 for purposes of this case.</p> <p>3 Now, as the director of engineering</p> <p>4 for the Pennsylvania and Delaware districts,</p> <p>5 you have various directors that are underneath</p> <p>6 of you, correct?</p> <p>7 A. Managers.</p> <p>8 Q. You call them managers?</p> <p>9 A. Yes.</p> <p>10 Q. Brian Magee would be a manager?</p> <p>11 A. Would be a manager.</p> <p>12 Q. Carl Gross would be a manager?</p> <p>13 A. Correct.</p> <p>14 Q. I already have a list of all their</p> <p>15 names through the course of discovery and under</p> <p>16 each manager they're responsible for</p> <p>17 supervising a team of engineers, correct?</p> <p>18 A. Correct.</p> <p>19 Q. In terms of monitoring the day-to-day</p> <p>20 work performance of the engineers, you delegate</p> <p>21 that responsibility to your managers; is that</p> <p>22 fair?</p> <p>23 A. Yes, I do.</p> <p>24 Q. Do you in any way, shape or form</p>	<p style="text-align: right;">11</p> <p>1 A. Yes.</p> <p>2 Q. Do you remember when the concept of a</p> <p>3 RIF which would impact your engineering</p> <p>4 department for 2015 first came to your</p> <p>5 attention?</p> <p>6 A. I'd be guessing. It was right around</p> <p>7 the end of the first quarter, I think.</p> <p>8 Q. Sometime in late 2014?</p> <p>9 A. No, I thought it was more -- I'm not</p> <p>10 100 percent, but I thought it was more the</p> <p>11 beginning of 2015.</p> <p>12 Q. When you base your quarters annually,</p> <p>13 they're quarterly based on the calendar year,</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. So when would the end of the first</p> <p>17 quarter typically end?</p> <p>18 A. It would be March.</p> <p>19 Q. Would it be fair that you started to</p> <p>20 discuss the prospect of a RIF and headcount</p> <p>21 impact, et cetera, before March of 2015?</p> <p>22 A. I'm not 100 percent to be honest with</p> <p>23 you.</p> <p>24 Q. No problem, we'll take a look at</p>
<p style="text-align: right;">10</p> <p>1 complete performance evaluations for the</p> <p>2 managers?</p> <p>3 A. For the managers, I do.</p> <p>4 Q. Strike that. I mean for the</p> <p>5 engineers.</p> <p>6 A. No, I don't do it for the engineers.</p> <p>7 Q. When it, in fact, came time to rank</p> <p>8 the employees and assess their performance in</p> <p>9 terms of putting them in a particular order, do</p> <p>10 you think your managers were best suited to</p> <p>11 make that assessment?</p> <p>12 A. Yes, I do.</p> <p>13 Q. You didn't question any of your</p> <p>14 managers once that process transpired, did you?</p> <p>15 A. No.</p> <p>16 Q. I just want to backtrack from the</p> <p>17 beginning when the concept of the RIF first</p> <p>18 started that was going to take place in the</p> <p>19 spring of 2015 and when in terms of your</p> <p>20 awareness of numbers or the percentage in terms</p> <p>21 of your headcount, how that had to be impacted.</p> <p>22 Okay?</p> <p>23 A. Uh-huh.</p> <p>24 Q. Sorry, you have to say yes or no.</p>	<p style="text-align: right;">12</p> <p>1 documents.</p> <p>2 * * *</p> <p>3 (Whereupon, Exhibit Muccilo-1 was</p> <p>4 marked for identification.)</p> <p>5 * * *</p> <p>6 BY MS. BURKE:</p> <p>7 Q. The way that the chronology of the</p> <p>8 emails works when they're produced during</p> <p>9 discovery generally is it's backwards, so the</p> <p>10 first email in its order would be on the last</p> <p>11 pages. I stapled all these together for the</p> <p>12 full email just so you could have the string in</p> <p>13 case you asked, but ultimately, I wanted to</p> <p>14 focus your attention on the first one at issue.</p> <p>15 Take as much time as you need to review the</p> <p>16 document and let me know when you're ready.</p> <p>17 A. Okay.</p> <p>18 Q. For context purposes, can you look at</p> <p>19 the second page of this document that's Bates</p> <p>20 stamped DEF Walker 3131? At the bottom there</p> <p>21 are Bates stamp numbers. Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. These are a different Joe, Joe Freed.</p> <p>24 Do you know who that is?</p>

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Pages 13 to 16

<p style="text-align: right;">13</p> <p>1 A. Not -- I mean, I know the name.</p> <p>2 Q. But not really familiar?</p> <p>3 A. No.</p> <p>4 Q. What about Clifford Foley, Jr.?</p> <p>5 A. Yes, I do know Cliff.</p> <p>6 Q. Who is Cliff?</p> <p>7 A. Cliff at the time was -- we were</p> <p>8 working for Maureen Davis and Cliff was almost</p> <p>9 like her staff manager, kind of helping, I</p> <p>10 guess, you know, coordinate across all of her</p> <p>11 directors.</p> <p>12 Q. When you say working under Maureen</p> <p>13 Davis, was she above Bill Bragg, obviously?</p> <p>14 A. Yes.</p> <p>15 Q. Now, just for context, it doesn't</p> <p>16 look like you're cc'ed on this email but I want</p> <p>17 to discuss it with you. As of January 21st,</p> <p>18 2015, there's an email to these individuals and</p> <p>19 toward the bottom it says Cliff, you gave me</p> <p>20 your list of engineers to retain, but it</p> <p>21 appears it is more than 36 percent you had</p> <p>22 originally retained. Originally, we had 63 or</p> <p>23 64 sent to EWAs. We need to meet that original</p> <p>24 number.</p>	<p style="text-align: right;">15</p> <p>1 assignment.</p> <p>2 Q. The 155 retained engineers will allow</p> <p>3 for basic support, maintenance and minimal</p> <p>4 provisioning. Was it your understanding that</p> <p>5 155 would be retained just as to your</p> <p>6 organization or under multiple different areas?</p> <p>7 A. It was multiple different areas.</p> <p>8 Q. As of this point, had you given</p> <p>9 anyone any names on a list that you were not</p> <p>10 intent on retaining?</p> <p>11 A. No, this was just an exercise of the</p> <p>12 amount of people we needed to have working our</p> <p>13 normal day business in case there was a work</p> <p>14 stoppage.</p> <p>15 Q. So did this have any relation to the</p> <p>16 RIF then?</p> <p>17 A. No.</p> <p>18 * * *</p> <p>19 (Whereupon, Exhibit Muccilo-2 was</p> <p>20 marked for identification.)</p> <p>21 * * *</p> <p>22 BY MS. BURKE:</p> <p>23 Q. We're marking this as Muccilo-2. It</p> <p>24 looks like this is an email from Laura</p>
<p style="text-align: right;">14</p> <p>1 If you turn the page here, Cliff</p> <p>2 sends an email to Dorothy Fowler. Do you know</p> <p>3 who that is?</p> <p>4 A. Yes.</p> <p>5 Q. Who is that?</p> <p>6 A. She was working at the time for Bill</p> <p>7 Bragg, so she was kind of Bill's staff person.</p> <p>8 Q. And he writes to her, the engineering</p> <p>9 team needs to throttle back, plan as if we were</p> <p>10 not provisioning, they need more from your</p> <p>11 pool. See below.</p> <p>12 Did you ever see that email as</p> <p>13 forward?</p> <p>14 A. Potentially. I'm not 100 percent</p> <p>15 sure.</p> <p>16 Q. Let's look at the top email. You are</p> <p>17 cc'ed on this one, right?</p> <p>18 A. Yes.</p> <p>19 Q. This is as of January 22nd, 2015. It</p> <p>20 identifies as of that date, attached is the</p> <p>21 revised list of additional names that can be</p> <p>22 released for EWA. What did you understand EWA</p> <p>23 to mean?</p> <p>24 A. EWA is emergency work stoppage</p>	<p style="text-align: right;">16</p> <p>1 Lippincott. Do you know who that is?</p> <p>2 A. Yep, yes.</p> <p>3 Q. In terms of engineering retained</p> <p>4 personnel, does this relate to the number of</p> <p>5 individuals who had to be physically working in</p> <p>6 the event of a work stoppage?</p> <p>7 A. This was -- it's a combination. We</p> <p>8 were trying to ballpark if there was a work</p> <p>9 stoppage who would be retained working, you</p> <p>10 know, our day-to-day stuff that we normally do</p> <p>11 and then who would go out into the field to</p> <p>12 actually do work.</p> <p>13 Q. No relation to the RIF though,</p> <p>14 correct?</p> <p>15 A. No.</p> <p>16 * * *</p> <p>17 (Whereupon, Exhibit Muccilo-3 was</p> <p>18 marked for identification.)</p> <p>19 * * *</p> <p>20 BY MS. BURKE:</p> <p>21 Q. Take as much time as you need and let</p> <p>22 me know if this does, in fact, relate to the</p> <p>23 RIF that was expected to take place.</p> <p>24 A. I do believe so.</p>

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Pages 17 to 20

<p style="text-align: right;">17</p> <p>1 Q. Then what role, if any, did Mike 2 Pescatore have in assisting with the RIF for 3 the engineering department? 4 A. Mike helped solicit and compile 5 information as we moved through the process. 6 Q. I'm going to step around and just 7 pull up the spreadsheet that goes with this so 8 that we can discuss what was attached to this 9 email. My apologies for stepping over you. 10 A. No problem. 11 Q. How often did you meet with Bragg for 12 staff meetings? 13 A. It was almost -- maybe almost weekly. 14 Q. So I guess at least as of March 20th, 15 on the second page of this exhibit, they're 16 going to discuss a headcount with you, or Bill 17 Bragg is, you and various other directors? 18 A. Correct. 19 Q. And May planning. Do you see that? 20 A. Yes. 21 Q. Then if we look to the first page 22 about three days later, that's the email from 23 Mike Pescatore. First attachment for reference 24 with targets. Second attachment is the</p>	<p style="text-align: right;">19</p> <p>1 various directors but would have included some 2 of your managers, right? 3 A. It should have. I'm just trying to 4 go back to remember how many directors Bill 5 had. I don't know if that includes Bill or 6 not, I'm not sure. 7 Q. Did you complete any of these 8 spreadsheets? 9 A. I didn't, no. 10 Q. They were just shared with you? 11 A. Shared. 12 Q. If you go to March plans, which is 13 the second tab, these are some of the 14 categories that Mr. Pescatore referenced. He 15 says no backfill, consolidation, performance. 16 Do you see that? 17 A. Yes. 18 Q. Now, looking at you, there's 19 executive director Bill Bragg and then for you 20 Joe Muccilo. Do you see that? 21 A. Yep. 22 Q. No backfill loss, there's a 2 there. 23 Do you know what that reflects? 24 A. Well, just from reading the notes,</p>
<p style="text-align: right;">18</p> <p>1 template we need to fill out with our plan. As 2 before, we will use the standard three 3 idea/actions: No backfill, consolidation, 4 performance. First of all, let's look at the 5 first attachment here, the one that says 6 worksheet. 7 A. Yes. 8 Q. The headcount, this is for the entire 9 organization under -- what's her name, who is 10 over Bragg? 11 A. Maureen. 12 Q. Is this for Maureen's organization? 13 A. This looks like just Bill Bragg's. 14 Q. Just as an example, if you're looking 15 under Mid Atlantic where it says 509 management 16 and then 436, is that associates? 17 A. Oh, okay, I see it. 509 management 18 employees, 436.5 associates, so that would be 19 under Bragg. 20 Q. Just going further down that column 21 it says five directors. Were you one of the 22 five directors for the Mid Atlantic? 23 A. Yes. 24 Q. Then the managers were under those</p>	<p style="text-align: right;">20</p> <p>1 these were -- the two no backfill loss I think 2 were people leaving our portion of the business 3 and maybe going to -- for example, Hoover, he 4 got promoted to Verizon Wireless. So in terms 5 of our force planning, we kind of had that as 6 one of our reductions. 7 Q. Which you were including from the 8 outset, right? 9 A. Yes. 10 Q. And this 1 here for performance, was 11 Szewczyk terminated for performance? 12 A. So if you meant Jim Szewczyk, the 13 manager, he was the manager so from a 14 performance -- he had someone on his side for 15 performance. I guess we were labeling him as a 16 performance issue, so it looks like it was 17 Lorenza. 18 Q. The employee? 19 A. The employee. 20 Q. That person was expected to be 21 terminated so they wouldn't be part of the -- 22 A. That person would be part of the 23 overall business case reduction. 24 Q. Oh, okay. Do you know if that person</p>

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Pages 21 to 24

<p style="text-align: right;">21</p> <p>1 was anticipated to be rated and ranked like</p> <p>2 everyone else?</p> <p>3 A. I'm not 100 percent, but according to</p> <p>4 the process, they probably should have been,</p> <p>5 yes.</p> <p>6 Q. By looking at this spreadsheet, are</p> <p>7 you able to identify if you were aware at this</p> <p>8 point how many of your employees may need to be</p> <p>9 impacted?</p> <p>10 A. No, no.</p> <p>11 Q. This was just giving some information</p> <p>12 for planning of that?</p> <p>13 A. Yeah, it seems like we were just</p> <p>14 running through different proposals.</p> <p>15 Q. And then the headcount detail tab,</p> <p>16 that's every director that's under Bragg,</p> <p>17 right?</p> <p>18 A. This is every management employee</p> <p>19 under Bill Bragg.</p> <p>20 Q. In the middle of this email from</p> <p>21 March 25th, which is two days later, that</p> <p>22 you're cc'ed on, it's from Mike Pescatore,</p> <p>23 team, very preliminary look at the HC options</p> <p>24 review for New Jersey totaling 12 employees.</p>	<p style="text-align: right;">23</p> <p>1 Q. There's more people than just Bragg,</p> <p>2 do you see that, under group?</p> <p>3 A. Yes.</p> <p>4 Q. And then the next level leader would</p> <p>5 be the one down, so your name is contained in</p> <p>6 some of these entries. Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. I only see your name in two areas but</p> <p>9 let's start with the one for PA no backfill.</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. 2. These are the same people we</p> <p>13 discussed before, aren't they?</p> <p>14 A. It seems like it, yes.</p> <p>15 Q. And then PA consolidation 1, we</p> <p>16 didn't discuss this one before, but what does</p> <p>17 that reflect?</p> <p>18 A. Consolidating two different manager</p> <p>19 groups, I guess maybe a potential to</p> <p>20 consolidate within each one of their spaces.</p> <p>21 Q. At this point, was this just the</p> <p>22 discussion about the headcount for management?</p> <p>23 A. This was just management.</p> <p>24 Q. And the spreadsheet also is</p>
<p style="text-align: right;">22</p> <p>1 Does that mean anything to you?</p> <p>2 A. From what I recall, it was kind of</p> <p>3 just the preliminary look at how New Jersey was</p> <p>4 going to go about a reduction if their number</p> <p>5 was 12, so kind of which groups would be</p> <p>6 impacted and kind of what functions.</p> <p>7 Q. That doesn't relate to your</p> <p>8 Pennsylvania/Delaware operation, right?</p> <p>9 A. No.</p> <p>10 Q. You might be able to do this yourself</p> <p>11 and if you don't feel comfortable, I'll do it</p> <p>12 for you. To go into the next spreadsheet, all</p> <p>13 you have to do is click this folder and the</p> <p>14 next one down. Do you see that?</p> <p>15 A. Okay.</p> <p>16 Q. 4169, for the record, you're looking</p> <p>17 at spreadsheet 4169?</p> <p>18 A. Yes.</p> <p>19 Q. Under March actions, is this</p> <p>20 something that you created?</p> <p>21 A. I guess off of a template, yes.</p> <p>22 Q. Did you help input information into</p> <p>23 this?</p> <p>24 A. I would say so, yes.</p>	<p style="text-align: right;">24</p> <p>1 respecting management?</p> <p>2 A. Yes.</p> <p>3 Q. Did you do that first, the</p> <p>4 discussions about headcounts for management and</p> <p>5 assessing those proper counts before any 7T</p> <p>6 band members were going to be impacted?</p> <p>7 A. When you say management, I'm talking</p> <p>8 my managers and their employees. So it's band</p> <p>9 6 and band 7.</p> <p>10 Q. This would include band 7?</p> <p>11 A. Yes.</p> <p>12 Q. At this point though, had you had any</p> <p>13 discussion about whether or not any of the</p> <p>14 engineers underneath your managers were going</p> <p>15 to be impacted and who?</p> <p>16 A. Not very specific names. I mean, I</p> <p>17 think we had some names based on certain</p> <p>18 factors, like we knew someone was getting</p> <p>19 promoted out. So whatever our number was going</p> <p>20 to be, that would be part of our number. We</p> <p>21 would take advantage of that.</p> <p>22 Q. That Lorenza, was that an actual</p> <p>23 engineer under one of your managers or was it a</p> <p>24 higher level employee?</p>

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Pages 25 to 28

<p style="text-align: right;">25</p> <p>1 A. It was an engineer under one of my 2 managers.</p> <p>3 Q. And that person was singled out 4 because there were, in fact, noted performance 5 concerns?</p> <p>6 A. I believe so.</p> <p>7 Q. Do you know if the person was on some 8 kind of PIP or something?</p> <p>9 A. Not that I recall.</p> <p>10 Q. Were you peripherally aware, based on 11 who their manager was, that they were having 12 problems with Lorenza?</p> <p>13 A. No, no, I think it was more of the 14 mind set, you know, of the whole ranking.</p> <p>15 Q. Do you know if ranking had occurred 16 at that point when Lorenza was even identified?</p> <p>17 A. No.</p> <p>18 Q. Do you know where his name even came 19 from? Did it come from you?</p> <p>20 A. It didn't come from me. It came from 21 my manager.</p> <p>22 Q. So as of this point, had you even 23 asked your managers to start ranking their 24 employees?</p>	<p style="text-align: right;">27</p> <p>1 performance?</p> <p>2 A. No, because I -- I'm not 100 percent.</p> <p>3 Q. And you're not even sure if he was 4 actually released as part of the RIF?</p> <p>5 A. That's correct.</p> <p>6 * * *</p> <p>7 (Whereupon, Exhibit Muccilo-4 was 8 marked for identification.)</p> <p>9 * * *</p> <p>10 BY MS. BURKE:</p> <p>11 Q. This is a continuation of emails, 12 just has an additional one at the top that 13 wasn't contained in the prior string. The last 14 email that you and I looked at identified 15 updates to second attachment, including PA high 16 level plans. Let's look at the top one. 17 Bill, that's William Bragg, right?</p> <p>18 A. Correct.</p> <p>19 Q. Final draft puts us at 35. 20 Individual plans may change depending on 21 detailed RIF planning efforts over the next 22 week. Please let me know if you want me to 23 send this to Shannon. 24 Where it says final draft puts us at</p>
<p style="text-align: right;">26</p> <p>1 A. No.</p> <p>2 Q. So are you 100 percent sure where 3 Lorenza's name came up in those spreadsheets?</p> <p>4 A. No, I think it was really just 5 initial planning around our preliminary first 6 pass at the numbers.</p> <p>7 Q. Was anyone else that was an engineer 8 named in these early RIF discussions based on 9 performance?</p> <p>10 A. Not that I know of, no.</p> <p>11 Q. Do you remember who Lorenza's actual 12 manager was?</p> <p>13 A. I thought it was Jim Szewczyk.</p> <p>14 Q. Do you know if Lorenza ultimately was 15 impacted by the RIF?</p> <p>16 A. I don't remember.</p> <p>17 Q. Mr. Lorenza, that's not the same 18 person as Ronald Lowe, is it?</p> <p>19 A. Shouldn't be, no.</p> <p>20 Q. He's not contained in the list of any 21 of the rate and ranks provided for all those 22 rated and ranked in your organization. Do you 23 know if he was picked in the outset to be 24 included in who would be released based on</p>	<p style="text-align: right;">28</p> <p>1 35, was it your understanding that 35 2 individuals may be impacted overall?</p> <p>3 A. I would -- I guess so.</p> <p>4 Q. Not sure?</p> <p>5 A. Not sure. I mean, I think at this 6 point we were -- I don't think we had a set 7 number and I think we were still just planning.</p> <p>8 MR. BARRAS: Don't guess on your 9 answers either.</p> <p>10 MS. NERO: Yeah, you're not 11 helping her.</p> <p>12 BY MS. BURKE:</p> <p>13 Q. So you have no idea, just for the 14 record, 35, where that identifies a number of 15 employees to be impacted; is that fair?</p> <p>16 A. Correct.</p> <p>17 Q. I just want you to go to the 18 attachment for this, which is 4173 if you 19 navigate the folder.</p> <p>20 A. 4173, okay.</p> <p>21 Q. In terms of March plans, that 22 particular tab, at least where you are 23 identified the backfill and performance areas 24 had not changed, right?</p>

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Pages 29 to 32

<p style="text-align: right;">29</p> <p>1 A. Correct.</p> <p>2 Q. If you go down the chart where it's</p> <p>3 still under you, no backfill loss is at 2,</p> <p>4 consolidation 4, performance zero. Do you know</p> <p>5 what that chart is for?</p> <p>6 A. Again, this was preliminary planning</p> <p>7 I would say based around risk.</p> <p>8 Q. Are you familiar with these charts?</p> <p>9 Did you look at them when they were sent to</p> <p>10 you?</p> <p>11 A. Yes.</p> <p>12 Q. The numbers identified here for no</p> <p>13 backfill loss that don't have explanations, the</p> <p>14 second chart down, do you know where those</p> <p>15 numbers even come from?</p> <p>16 A. It would have been somewhat of a --</p> <p>17 you know what, I guess I'd be guessing. I</p> <p>18 don't know.</p> <p>19 Q. If you go to the right, use the tool</p> <p>20 bar to go all the way over, it starts out with</p> <p>21 the highlights low risk plan, nine people. Do</p> <p>22 you see that?</p> <p>23 A. Low risk, nine people.</p> <p>24 Q. Low to medium risk plan, 17 people</p>	<p style="text-align: right;">31</p> <p>1 your Pennsylvania/Delaware area, right?</p> <p>2 A. Eventually, I did, yes.</p> <p>3 Q. What, as the process proceeded?</p> <p>4 A. Correct.</p> <p>5 Q. You're not sure what final draft puts</p> <p>6 us on 35, right?</p> <p>7 A. Correct.</p> <p>8 Q. It doesn't look like it's divvied up</p> <p>9 here unless you're able to tell based on the</p> <p>10 spreadsheet. Do you know if at this point you</p> <p>11 had conveyed to any of your particular team</p> <p>12 members how many people had to go?</p> <p>13 A. At this point, no, it would have been</p> <p>14 just ballparking.</p> <p>15 Q. Did you give out ballparks to your</p> <p>16 managers about how many people you thought had</p> <p>17 to go before you actually knew?</p> <p>18 A. No, we were mainly just planning</p> <p>19 around -- you know, we tried to soften the</p> <p>20 blow, I would say, looking for people that were</p> <p>21 willing to leave. So we kind of look at it</p> <p>22 from that perspective to say, okay, if we got</p> <p>23 to go down, what functions do we want to go</p> <p>24 down and which people potentially fit in those</p>
<p style="text-align: right;">30</p> <p>1 (plus 8). Higher risk plan, 23 people (plus</p> <p>2 6). Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. What was what did that reflect, those</p> <p>5 varying degrees?</p> <p>6 A. At this time we didn't have a</p> <p>7 definitive number, so we were looking at</p> <p>8 depending on the plan -- so low risk plan, this</p> <p>9 is what we felt where we could reduce, and then</p> <p>10 going into more of a medium risk and then a</p> <p>11 high risk. You can see the number of people</p> <p>12 are increasing.</p> <p>13 Q. It's just being discussed at this</p> <p>14 point; no final determination as to how many</p> <p>15 people?</p> <p>16 A. No, just kind of planning.</p> <p>17 Q. If you go to headcount detail.</p> <p>18 A. I'm there.</p> <p>19 Q. These individuals under headcount,</p> <p>20 are these everyone under you or each of the</p> <p>21 directors?</p> <p>22 A. If I sum up all the lines, it's over</p> <p>23 500 so it would be everyone under Bill.</p> <p>24 Q. You yourself had a headcount just for</p>	<p style="text-align: right;">32</p> <p>1 functions and, you know, is there a willingness</p> <p>2 to leave or not.</p> <p>3 Q. So as of this point, do you know if</p> <p>4 you had directed any of your managers to</p> <p>5 identify if people were willing to leave?</p> <p>6 A. I don't think we were canvassing</p> <p>7 anybody. I think just based on historical</p> <p>8 knowledge of, you know, people that were kind</p> <p>9 of looking to retire.</p> <p>10 Q. That had expressed an interest</p> <p>11 previously?</p> <p>12 A. Yeah, correct.</p> <p>13 * * *</p> <p>14 (Whereupon, Exhibit Muccilo-5 was</p> <p>15 marked for identification.)</p> <p>16 * * *</p> <p>17 BY MS. BURKE:</p> <p>18 Q. You can read the entire string. It's</p> <p>19 repetitive from other strings that we looked</p> <p>20 at, at least the first couple.</p> <p>21 A. Yes, I see that.</p> <p>22 Q. So the first page is what has the new</p> <p>23 strings, all right, just for purposes of</p> <p>24 completeness. At the top where you are, in</p>

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<p style="text-align: right;">33</p> <p>1 fact, cc'ed on the email from 3/26/15 it says, 2 HC options file sent to Shannon and Blair. 3 Adding Mid Atlantic Force v8 file with Colton's 4 update on the June plan tab. Starting point 5 for this RIF is 499. 39 removed; 7.7 percent. 6 At this point, do you know if you had 7 a headcount for your own particular area or if 8 there was just a headcount for everyone under 9 Bragg, and that's 7.7 percent of individuals 10 under Bragg would be impacted or anticipated to 11 be? 12 A. I don't -- I'm really not 100 13 percent. I don't remember. 14 Q. Let's look at the attachment. 15 A. I guess I would just be assuming. 16 Q. Do you have a rationale basis for 17 what you're saying? 18 A. No, it looks like we have an initial 19 -- I would say it sounds like we had an initial 20 number. 21 Q. For clarification, all I was saying 22 is, starting point for this RIF is 499. You 23 didn't even have 499 people under, right? 24 A. Correct.</p>	<p style="text-align: right;">35</p> <p>1 March? 2 Q. We're looking at March actions. 3 A. March actions, okay. Yeah, I see two 4 lines with my name on it. 5 Q. It's the same information that you 6 and I looked at a few emails back, right? 7 A. Correct. 8 Q. What I don't see is Lorenza that was 9 discussed in terms of performance before. Do 10 you notice that difference? 11 A. Yes, I do. 12 Q. Do you know if that changed at some 13 point, that individual's name contained in 14 these spreadsheets? 15 A. Potentially, yeah. I don't know the 16 timing of the different spreadsheets so -- 17 Q. I apologize if I asked you this 18 before. Was Lorenza actually terminated from 19 his employment? 20 A. I didn't remember. 21 Q. I'm just looking at this one, it says 22 HC savings. This number is higher than 35. Do 23 you know what the HC category even stands for? 24 A. It would be headcount.</p>
<p style="text-align: right;">34</p> <p>1 Q. That number looks more like a 2 headcount related to Bragg's organization, 3 right? 4 A. Yeah. 5 Q. And that 7.7 percent of those under 6 Bragg may be impacted? 7 A. Yes, so yeah. 8 Q. Do you know if at this point you knew 9 how many people you personally had to have 10 removed from your respective teams? 11 A. Yeah, probably. 12 Q. Can you tell by looking at this 13 email? 14 A. Snow. 15 Q. Let's take a look at the attachment, 16 which is 4179. 17 A. 4179? 18 Q. Yes. 19 A. Okay. 20 Q. There are certain groups identified, 21 obviously, including Bragg, and then next to 22 yourself delineated here you're the director at 23 issue. Do you see that? 24 A. Yeah. Are we looking at June or</p>	<p style="text-align: right;">36</p> <p>1 Q. Can you go to June actions, please? 2 A. (Witness complies with request.) 3 Q. This says potential HC, or headcount, 4 savings and it's higher, it says 97. Do you 5 see that? 6 A. Yes, I do. 7 Q. If we look under your name, there's 8 certain areas identified respecting 9 consolidations? 10 A. That's correct. 11 Q. What was the purpose of those 12 entries? 13 A. So this was, again, more planning 14 around when we did get a number, right, what 15 are some of the things that we can consolidate. 16 That was mainly most of our -- we were looking 17 to consolidate functions. 18 Q. Let's just use third party billing as 19 an example. You put 1 here, delay in 20 processing invoices, make ready work, 21 complaints and escalations, do you see that? 22 A. Yes. 23 Q. What were you going to do with 24 respect to third party billing?</p>

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Pages 37 to 40

<p style="text-align: right;">37</p> <p>1 A. For that one, it would just absorb</p> <p>2 with the rest of the team and, obviously, you</p> <p>3 know, the risk would be, you know, less people,</p> <p>4 same amount of work, so there would be delays.</p> <p>5 Q. Oh, I see. Would one person be</p> <p>6 impacted then?</p> <p>7 A. Yeah, that's kind of how we said it</p> <p>8 would be one person. We could have one person</p> <p>9 savings.</p> <p>10 Q. You have service orders. Who</p> <p>11 performed service orders?</p> <p>12 A. For this one associated under risks,</p> <p>13 that would have been under my manager, Jim</p> <p>14 Szewczyk.</p> <p>15 Q. Why would there be a 1 there then?</p> <p>16 A. We probably had multiple people doing</p> <p>17 service orders and we felt we can consolidate.</p> <p>18 Q. The right-of-way, do you see that?</p> <p>19 A. Yep, same kind of logic.</p> <p>20 Q. Design and provisioning, there's a 3</p> <p>21 there. What was the purpose of that?</p> <p>22 A. That was an area we felt we could</p> <p>23 outsource more of the work. We were doing some</p> <p>24 of it already and we felt we could accelerate</p>	<p style="text-align: right;">39</p> <p>1 A. It's 12 people.</p> <p>2 Q. Do you know if you ultimately ended</p> <p>3 up releasing 12 people?</p> <p>4 A. I thought -- I thought we did more.</p> <p>5 Q. How many do you think you did?</p> <p>6 A. I thought we did either 13 or 14.</p> <p>7 Q. Do you know if these numbers ever</p> <p>8 changed at some point?</p> <p>9 A. I don't know.</p> <p>10 Q. I'm going to give you Walker-14. To</p> <p>11 make this easier for you and your counsel, this</p> <p>12 is a collection of all the business cases for</p> <p>13 any individuals released under you as a</p> <p>14 director.</p> <p>15 A. Okay.</p> <p>16 Q. Let's do this: On the bottom</p> <p>17 right-hand corner you notice there's Bates</p> <p>18 stamp numbers.</p> <p>19 A. Yes.</p> <p>20 Q. You'll flip with me through the</p> <p>21 pages, but if you go to 759, Thomas was</p> <p>22 impacted, right? Do you see it says IM?</p> <p>23 A. 759, yes.</p> <p>24 Q. Then if you go to Page 766, Judy was</p>
<p style="text-align: right;">38</p> <p>1 and do more of that.</p> <p>2 Q. Design and engineering? You just</p> <p>3 answered it. I was just confirming.</p> <p>4 A. Well, one was design and</p> <p>5 provisioning, right, that was the 3 that I was</p> <p>6 answering to. That's a separate group than</p> <p>7 design engineering.</p> <p>8 Q. Which group did Suzette Walker fall</p> <p>9 into?</p> <p>10 A. She would have fallen under design</p> <p>11 engineering.</p> <p>12 Q. So you anticipated that you could</p> <p>13 potentially let four people go that did that</p> <p>14 function?</p> <p>15 A. Yes.</p> <p>16 Q. If you actually look for it's column</p> <p>17 28, all the ones that relate to you, 28 all the</p> <p>18 way to 34. It's 12 people. Do you see that?</p> <p>19 A. Yes, I do.</p> <p>20 MR. BARRAS: Object. The</p> <p>21 document speaks for itself but you</p> <p>22 can answer.</p> <p>23 BY MS. BURKE:</p> <p>24 Q. It's 12 people?</p>	<p style="text-align: right;">40</p> <p>1 impacted, just one person?</p> <p>2 A. Yes.</p> <p>3 MR. BARRAS: Objection. You can</p> <p>4 answer.</p> <p>5 THE WITNESS: What was that?</p> <p>6 MR. BARRAS: I said objection but</p> <p>7 you can answer.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MS. BURKE:</p> <p>10 Q. Then if you go to Page 772, Charles</p> <p>11 Browning was impacted, right?</p> <p>12 MR. BARRAS: Objection. You can</p> <p>13 answer.</p> <p>14 THE WITNESS: Yes.</p> <p>15 BY MS. BURKE:</p> <p>16 Q. Do you think Charles Browning was not</p> <p>17 impacted? Do you have any reason to disagree</p> <p>18 with this document?</p> <p>19 A. No, I think he was.</p> <p>20 Q. The people I've asked you about so</p> <p>21 far, were they impacted?</p> <p>22 A. Yeah, I think they were.</p> <p>23 Q. I think they were, too.</p> <p>24 MR. BARRAS: I agree. I'm just</p>

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<p style="text-align: right;">41</p> <p>1 saying the document speaks for 2 itself. 3 MS. BURKE: He's not sure if 12 4 people were impacted, 14, so we're 5 just going to count every one of them 6 if he's not able to do that. 7 MR. BARRAS: You can count every 8 one on Exhibit-14. 9 BY MS. BURKE: 10 Q. So I'm going keep going through this 11 with you. If you go to Page 775, this 12 particular employee, Deadra Johns, do you know 13 if she was a single incumbent under Cindy 14 Swipp? 15 A. Can you repeat that? 16 Q. Sure. Do you know who Deadra Johns 17 is? 18 A. Yes. 19 Q. Do you know if she was a single 20 incumbent based on her position? 21 A. I'm not sure. 22 Q. Do you even know what she did? 23 A. I -- I thought she did right-of-way. 24 Q. Do you know who Cindy Swipp is?</p>	<p style="text-align: right;">43</p> <p>1 Q. If you go to Page 798, Suzette Walker 2 was impacted, right? 3 A. Yes. 4 Q. If you go to Page 802, was John 5 Brause impacted? 6 A. Yes. 7 Q. If you go to Page 807, was Melissa 8 McHugh impacted? 9 A. Yes. 10 Q. What about CW Messick, was that 11 person impacted? 12 A. Yes. 13 Q. Then Page 813, if you look under 14 Thomas Miller, was that person impacted? 15 A. Yes. 16 Q. So including the single incumbent is 17 12 people. Is there anyone else that I haven't 18 identified that you believe was impacted as a 19 result of the RIF under you being a director? 20 A. I thought John Healy. 21 Q. What did John Healy do? 22 A. He was a manager of mine. 23 Q. He wasn't rate or ranked, correct? 24 A. I don't remember.</p>
<p style="text-align: right;">42</p> <p>1 A. Yes, she's my manager. 2 Q. How many people did she oversee? 3 A. Well, she has management and 4 associates. I want to say six management and 5 close to 40 associates. 6 Q. If you go to Page 780, Glen Gross, he 7 was impacted, right? 8 MR. BARRAS: Objection. You can 9 answer. 10 THE WITNESS: Yes. 11 BY MS. BURKE: 12 Q. And then if you go to Page 786, Paul 13 Brood, do you see that? 14 A. Yes. 15 Q. Impacted? 16 A. Yes. 17 Q. And then if you go to Page 791, 18 Ronald Lowe? 19 MR. BARRAS: Objection. You can 20 answer. 21 THE WITNESS: Yes. 22 BY MS. BURKE: 23 Q. Was that person impacted? 24 A. Yes.</p>	<p style="text-align: right;">44</p> <p>1 Q. He wasn't in any of the boxes that 2 you and I looked at when you guys were first 3 discussing -- 4 A. No. 5 Q. So other than the 12 people that you 6 and I looked at in Exhibit-14 and John Healy, 7 is there anyone else that you believe was 8 impacted that we have not discussed? 9 A. Not that I recall. 10 Q. So does 13 sound like an accurate 11 number? 12 A. Yeah, that's what I thought it was, 13 13 or 14. So 13 sounds accurate. 14 Q. I just want to make sure there's not 15 someone else that I'm not aware of. 16 A. Not that I'm aware of. 17 Q. The spreadsheet that we're looking at 18 here and these numbers and the reasons why 19 these particular numbers could be sacrificed, 20 is there any other occasion that you had a role 21 in creating these numbers or risks associated 22 with them? 23 A. Can you repeat that? 24 Q. Is there any other occasion besides</p>

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<p style="text-align: right;">45</p> <p>1 this particular spreadsheet which is Bates</p> <p>2 stamped 4179 where you identified which roles</p> <p>3 could be impacted and what the risks were that</p> <p>4 were associated with that impact?</p> <p>5 A. I mean, other than just ongoing</p> <p>6 conversations with my managers, I don't think</p> <p>7 there were any other additional updates to this</p> <p>8 that would have been made.</p> <p>9 Q. When we were looking at the</p> <p>10 performance and consolidation, design</p> <p>11 engineering, that's what you identified that's</p> <p>12 what Suzette Walker did?</p> <p>13 A. That would have been within the</p> <p>14 design engineering groups.</p> <p>15 Q. You estimated that approximately four</p> <p>16 would be subject to the RIF?</p> <p>17 A. That was kind of the high level plan.</p> <p>18 Q. Did that change at any point, any of</p> <p>19 these numbers that we looked at?</p> <p>20 A. Yeah, potentially.</p> <p>21 Q. Potentially. Did it or not?</p> <p>22 A. I don't remember if it did or not.</p> <p>23 * * *</p> <p>24 (Whereupon, Exhibit Muccilo-6 was</p>	<p style="text-align: right;">47</p> <p>1 Q. Understood. 165 management by 5/25.</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And then the forward below from Laura</p> <p>5 Lippincott to Diane, take as much time as you</p> <p>6 need and let me know when you're ready for me</p> <p>7 to ask you questions.</p> <p>8 A. I'm ready.</p> <p>9 Q. She gives various dates and what the</p> <p>10 potential headcount will be as of certain</p> <p>11 dates. Do you see that?</p> <p>12 A. Yes.</p> <p>13 Q. The 5/25 says management headcount</p> <p>14 will be at 165, 12 folks leave under the RIF.</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Does that comport with your</p> <p>18 recollection?</p> <p>19 A. Yeah.</p> <p>20 Q. Well, you seem hesitant.</p> <p>21 A. No, I mean, it's just -- it seems</p> <p>22 like it's a walk of our headcount.</p> <p>23 Q. And the 165, that's only as it</p> <p>24 pertains to your organization?</p>
<p style="text-align: right;">46</p> <p>1 marked for identification.)</p> <p>2 * * *</p> <p>3 BY MS. BURKE:</p> <p>4 Q. This might give you some more</p> <p>5 clarity. First of all, you can take as much</p> <p>6 time as you need to look at this particular</p> <p>7 email.</p> <p>8 A. Okay.</p> <p>9 Q. On the first page of this email, it's</p> <p>10 an email only from Diane Redilla to you. Do</p> <p>11 you see that?</p> <p>12 A. Yes.</p> <p>13 Q. And it's subject and it's a forward</p> <p>14 please review headcount from another email from</p> <p>15 Laura Lippincott. Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Now she's talking to you saying FYI,</p> <p>18 we'll be at 165 including one VLDP. What does</p> <p>19 that stand for?</p> <p>20 A. That's a program we have. It's a</p> <p>21 Verizon leadership development program, so it's</p> <p>22 headcount but it's not really our headcount</p> <p>23 because they rotate to different parts of the</p> <p>24 business.</p>	<p style="text-align: right;">48</p> <p>1 A. Yes, that's just -- yes.</p> <p>2 Q. So as of 5/25, your headcount would</p> <p>3 be 165 and 12 people were leaving as per the</p> <p>4 RIF?</p> <p>5 A. That's what it says.</p> <p>6 Q. You and I just counted a moment ago</p> <p>7 the 12 people that were RIF'ed and the 13th you</p> <p>8 told me was John Healy, right?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know if John Healy was</p> <p>11 impacted sometime before the actual rates and</p> <p>12 ranks occurred?</p> <p>13 A. No, John really was an expression of</p> <p>14 a willingness to leave.</p> <p>15 Q. Did he leave with a voluntary RIF</p> <p>16 package?</p> <p>17 A. I guess you can call it that.</p> <p>18 Q. Or early retirement or something?</p> <p>19 A. It was part of, I guess, our RIF.</p> <p>20 Q. He volunteered?</p> <p>21 A. He expressed a willingness to go.</p> <p>22 Q. Did you force him out against his</p> <p>23 will?</p> <p>24 A. No, he was willing to go and so I</p>

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<p style="text-align: right;">49</p> <p>1 made the decision to consolidate my groups and</p> <p>2 to use John as one of my reductions.</p> <p>3 Q. Now, did you hold individual calls</p> <p>4 with each one of your managers about the number</p> <p>5 of people that had to go or did you hold a</p> <p>6 joint call with all your managers? How did you</p> <p>7 proceed once you knew how many people had to be</p> <p>8 impacted?</p> <p>9 A. It was a joint call.</p> <p>10 Q. With each one of your managers?</p> <p>11 A. Yeah, all of my managers were on the</p> <p>12 call.</p> <p>13 Q. What, if anything, did you relay to</p> <p>14 them?</p> <p>15 A. Well, we have calls weekly, so it was</p> <p>16 probably -- you know, it was a series of calls,</p> <p>17 and as this progressed, more and more were</p> <p>18 shared. The initial call was probably, you</p> <p>19 know, there's a reduction coming so let's start</p> <p>20 planning around where we feel there's functions</p> <p>21 we can either reduce or consolidate.</p> <p>22 Q. I'm going show you an exhibit that's</p> <p>23 been marked as Gross-2. Besides Magee and</p> <p>24 Gross, you had other managers that oversaw</p>	<p style="text-align: right;">51</p> <p>1 Q. Who took over his people, like Gary</p> <p>2 Rodondo, Jeffrey --</p> <p>3 A. I merged John's group with Steve</p> <p>4 Septak.</p> <p>5 Q. At the time that they were supposed</p> <p>6 to look at their engineering III specialists</p> <p>7 for this RIF, was Healy still employed or those</p> <p>8 responsibilities were pushed over to Mr.</p> <p>9 Septak?</p> <p>10 A. No, Healy was still employed.</p> <p>11 Q. So you'd be looking at Gross' team,</p> <p>12 Healy's team, Magee's team, Septak's team and</p> <p>13 Silinskie's team?</p> <p>14 A. Yes.</p> <p>15 Q. Would you be looking at Smail's as</p> <p>16 well?</p> <p>17 A. Matt Gary's group does different</p> <p>18 functions.</p> <p>19 Q. And you wouldn't be looking at</p> <p>20 Smith's group for those four people, right?</p> <p>21 A. No, Smith's group had different</p> <p>22 functions.</p> <p>23 Q. Of the four people, not everybody had</p> <p>24 to, for example, come from Gross' group? It</p>
<p style="text-align: right;">50</p> <p>1 engineering 3 specialist, right?</p> <p>2 A. Yeah, all of my managers, I think,</p> <p>3 oversee engineer 3 specialists.</p> <p>4 Q. In terms of the spreadsheets that you</p> <p>5 monitored on either a daily, weekly or monthly</p> <p>6 basis for facility verification -- do you know</p> <p>7 what I'm talking about?</p> <p>8 A. Yes.</p> <p>9 Q. That was for all your managers and</p> <p>10 their respective engineering specialists?</p> <p>11 A. Certain groups, yes. Brian and Carl,</p> <p>12 they're part of that group, yes.</p> <p>13 Q. Well, not just Brian and Carl, other</p> <p>14 managers, right?</p> <p>15 A. Correct.</p> <p>16 Q. For the four engineering III</p> <p>17 specialists that may be impacted, which groups</p> <p>18 were you targeting? Any in particular or was</p> <p>19 it across the board?</p> <p>20 A. It should have been -- I think it was</p> <p>21 across the board.</p> <p>22 Q. Healy was one of your managers at the</p> <p>23 time, right?</p> <p>24 A. He was one of my managers.</p>	<p style="text-align: right;">52</p> <p>1 was just doing a rate and rank for all these</p> <p>2 employees, right?</p> <p>3 A. Yes.</p> <p>4 Q. You're saying ideally that's what</p> <p>5 should have occurred, right?</p> <p>6 A. Ideally, right.</p> <p>7 Q. You didn't do the rates and ranks,</p> <p>8 did you?</p> <p>9 A. No, I did not.</p> <p>10 Q. You delegated that responsibility to</p> <p>11 your group?</p> <p>12 A. Yes.</p> <p>13 Q. At some point, from Mike Pescatore,</p> <p>14 were you provided an email that says have them</p> <p>15 do the rate and rank and then give me a list of</p> <p>16 names?</p> <p>17 A. I don't know if it was from Mike but</p> <p>18 I would think that's how it went.</p> <p>19 Q. Let me grab the email first so</p> <p>20 there's no confusion. Here's Parker-1. This</p> <p>21 is an email dated March 31st, 2015 from Melissa</p> <p>22 Parker. Are you familiar with her in HR?</p> <p>23 A. Yes.</p> <p>24 Q. You're cc'ed on this email, right?</p>

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<p style="text-align: right;">53</p> <p>1 A. Yes.</p> <p>2 Q. Do you recall receiving this?</p> <p>3 A. Yes.</p> <p>4 Q. It says based on our call yesterday,</p> <p>5 I have provided Mike with the template to</p> <p>6 submit employee names to me so that I can</p> <p>7 create the cases for you. She wants it by</p> <p>8 close of business tomorrow and then she</p> <p>9 articulates the process. Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. Where she references Mike, you see</p> <p>12 Michael Pescatore is cc'ed on this email,</p> <p>13 right?</p> <p>14 A. Yes.</p> <p>15 Q. No other Mikes are copied on this</p> <p>16 email either in the to area or the cc, right?</p> <p>17 MR. BARRAS: Objection. You can</p> <p>18 answer.</p> <p>19 THE WITNESS: Correct.</p> <p>20 BY MS. BURKE:</p> <p>21 Q. Do you think she's talking about any</p> <p>22 other Mike?</p> <p>23 A. No.</p> <p>24 Q. Can you take a look at what's been</p>	<p style="text-align: right;">55</p> <p>1 Pescatore or HR?</p> <p>2 A. I did not review the rate and ranks.</p> <p>3 I would have seen the names of the impacted</p> <p>4 individuals.</p> <p>5 Q. Let me pull this up for you. For the</p> <p>6 record, I'm going to show you what's Bates</p> <p>7 stamped 2651, which was up on your computer</p> <p>8 when you first came in today. Take a look at</p> <p>9 that. Have you ever seen that document in that</p> <p>10 format before, either blank or filled out?</p> <p>11 A. It looks familiar.</p> <p>12 Q. It looks familiar to you?</p> <p>13 A. Yeah.</p> <p>14 Q. Blank, filled out or both?</p> <p>15 MR. BARRAS: He's got an issue</p> <p>16 with the way he can view it,</p> <p>17 something about protected view.</p> <p>18 MS. BURKE: He can put enable.</p> <p>19 You guys put a password on some of</p> <p>20 these things though.</p> <p>21 BY MS. BURKE:</p> <p>22 Q. Were you able to adjust it or not?</p> <p>23 A. Yes.</p> <p>24 Q. Are you familiar with it?</p>
<p style="text-align: right;">54</p> <p>1 previously marked as Parker-2? It's a lengthy</p> <p>2 document. I just want to know if you've ever</p> <p>3 seen it before.</p> <p>4 A. I have.</p> <p>5 Q. Only during litigation or at the time</p> <p>6 it was shared with management?</p> <p>7 A. Probably at the time, at the time it</p> <p>8 was shared with management.</p> <p>9 Q. Is it your understanding that that</p> <p>10 particular book is supposed to aid your</p> <p>11 managers in their compilation of the rate and</p> <p>12 rank?</p> <p>13 A. Yes.</p> <p>14 Q. In terms of your involvement in this</p> <p>15 process, first of all, did you ever use that</p> <p>16 book to rate and rank any engineering III</p> <p>17 specialists?</p> <p>18 A. No.</p> <p>19 Q. Or IV specialists?</p> <p>20 A. No.</p> <p>21 Q. When, in fact, your managers rate and</p> <p>22 ranked any of their team members, did you</p> <p>23 personally review that information or you</p> <p>24 understood that it was just shared with Mike</p>	<p style="text-align: right;">56</p> <p>1 A. Like I said, it looks familiar. I</p> <p>2 don't recall if I only saw it blank or filled</p> <p>3 out.</p> <p>4 Q. Did you get a list of approximately</p> <p>5 12 employees so that a business case could be</p> <p>6 created?</p> <p>7 A. I knew the selected employees. Then</p> <p>8 what I don't recall is did I see an official</p> <p>9 formal this sheet filled out with those people</p> <p>10 on it.</p> <p>11 MS. BURKE: Can you read that</p> <p>12 back, please, Hope?</p> <p>13 * * *</p> <p>14 (Whereupon, the court reporter</p> <p>15 read back the pertinent testimony.)</p> <p>16 * * *</p> <p>17 BY MS. BURKE:</p> <p>18 Q. You didn't assist Melissa Parker in</p> <p>19 actually creating the business case, did you?</p> <p>20 A. Maybe for mine, you know, for John</p> <p>21 but not for the others.</p> <p>22 Q. For Healy, you mean?</p> <p>23 A. Yes.</p> <p>24 Q. Did you just take a look at them when</p>

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<p style="text-align: right;">57</p> <p>1 they were finished?</p> <p>2 A. Like I said, I don't think I looked.</p> <p>3 I just knew the impacted individuals. I didn't</p> <p>4 look at the specific --</p> <p>5 Q. You just knew what their names were</p> <p>6 and they were on the list?</p> <p>7 A. Yes.</p> <p>8 Q. And you weren't questioning your</p> <p>9 management's ability to rank them and identify</p> <p>10 what they perceived to be the stronger or</p> <p>11 weaker performers?</p> <p>12 A. Nope.</p> <p>13 Q. Did you perceive Gross and Magee's</p> <p>14 team to be more beneficial to the business to</p> <p>15 sacrifice people from just their respective</p> <p>16 teams versus anybody else's?</p> <p>17 A. Can you say that again?</p> <p>18 Q. Did you think it was more beneficial</p> <p>19 for Verizon to focus just on Gross and Magee's</p> <p>20 teams in terms of pulling people for the RIF</p> <p>21 from there versus any of the other managers we</p> <p>22 discussed, Healy, Septak?</p> <p>23 MR. BARRAS: Objection.</p> <p>24 THE WITNESS: No, because we</p>	<p style="text-align: right;">59</p> <p>1 Q. With the engineering III specialists,</p> <p>2 the managers that you would have had targets</p> <p>3 assigned would be Gross, Healy, Magee, Septak</p> <p>4 and Silinskie?</p> <p>5 A. Yes.</p> <p>6 Q. So that's five managers, right?</p> <p>7 A. That's five managers.</p> <p>8 Q. To your knowledge, only four</p> <p>9 engineering III specialists had to go?</p> <p>10 A. Because we had other movements happen</p> <p>11 during the course of all of this.</p> <p>12 Q. Right. I'm just confirming it was</p> <p>13 only four that were going to be impacted,</p> <p>14 right?</p> <p>15 A. I believe so, yes.</p> <p>16 Q. Did you want at least one from each</p> <p>17 team?</p> <p>18 A. That was the plan. Then, again, as</p> <p>19 things unfolded, we had people get promoted and</p> <p>20 moved out, which impacted our headcount in a</p> <p>21 positive way and obviously, it went down. All</p> <p>22 right, so those -- I don't remember exactly how</p> <p>23 it played out, but if a manager lost someone</p> <p>24 due to a promotion to another organization,</p>
<p style="text-align: right;">58</p> <p>1 pulled from all of them.</p> <p>2 BY MS. BURKE:</p> <p>3 Q. Okay, I just wanted to make sure.</p> <p>4 Just giving an example, if the four people were</p> <p>5 all on Magee's team as the weakest link, so to</p> <p>6 speak, based on performance, they got the</p> <p>7 lowest scores, would that have impacted your</p> <p>8 decision about where people came from or would</p> <p>9 you have just shifted employees around?</p> <p>10 MR. BARRAS: Objection. You can</p> <p>11 answer.</p> <p>12 THE WITNESS: No, that's not how</p> <p>13 we did it. So we didn't lump all of</p> <p>14 our engineers into one bucket and say</p> <p>15 rate and rank them. Because now</p> <p>16 you're getting into different</p> <p>17 manager's opinions of people that</p> <p>18 don't work for them. That's why we</p> <p>19 consolidated that each design manager</p> <p>20 rate and rank only their own team.</p> <p>21 Then we had basically targets</p> <p>22 assigned, I would say, for each</p> <p>23 manager to reduce.</p> <p>24 BY MS. BURKE:</p>	<p style="text-align: right;">60</p> <p>1 then I may not have been looking for them to</p> <p>2 actually do a reduction because technically</p> <p>3 they already took a reduction.</p> <p>4 Q. Whose team was that?</p> <p>5 A. I mean, earlier in the year, Steve</p> <p>6 had one.</p> <p>7 Q. Septak?</p> <p>8 A. Septak, I believe he had Hoover get</p> <p>9 promoted.</p> <p>10 Q. Which we saw in the documents, right?</p> <p>11 A. Yes. Then I thought Carl Gross had</p> <p>12 one as well.</p> <p>13 Q. Promotion?</p> <p>14 A. Promotion out.</p> <p>15 Q. Who was that?</p> <p>16 A. What was his name? If I had a list,</p> <p>17 I could probably --</p> <p>18 Q. Is it Ed Boudman?</p> <p>19 A. No.</p> <p>20 Q. Ed Battista?</p> <p>21 A. No.</p> <p>22 Q. Sam Capizzi?</p> <p>23 A. No.</p> <p>24 Q. Dave Dehaven?</p>

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<p style="text-align: right;">61</p> <p>1 A. No.</p> <p>2 Q. Chirag Jagwani?</p> <p>3 A. Yes.</p> <p>4 Q. He was promoted out?</p> <p>5 A. Yeah.</p> <p>6 Q. So did you tell Mr. Gross then that</p> <p>7 he did not have to impact one of his employees</p> <p>8 then?</p> <p>9 A. Yeah, I don't exactly remember the</p> <p>10 timing of it, but potentially yes, I think</p> <p>11 that's how it happened.</p> <p>12 Q. Did any of the employees that you</p> <p>13 worked with ever express to you that there was</p> <p>14 just a generalized fear among employees that if</p> <p>15 they had a number of years of service they</p> <p>16 would be targeted for a RIF?</p> <p>17 A. Not that I recall, no.</p> <p>18 Q. Did Laura Lippincott ever express</p> <p>19 that concern to you?</p> <p>20 A. Not that I recall but --</p> <p>21 * * *</p> <p>22 (Whereupon, Exhibit Muccilo-7 was</p> <p>23 marked for identification.)</p> <p>24 * * *</p>	<p style="text-align: right;">63</p> <p>1 individual on Magee's team was either white or</p> <p>2 one was Asian, right?</p> <p>3 MR. BARRAS: Objection. You can</p> <p>4 answer.</p> <p>5 THE WITNESS: I don't know.</p> <p>6 BY MS. BURKE:</p> <p>7 Q. You can look at the ethnic group</p> <p>8 description area.</p> <p>9 A. Okay.</p> <p>10 MR. BARRAS: Objection. The</p> <p>11 document speaks for itself. You can</p> <p>12 answer.</p> <p>13 BY MS. BURKE:</p> <p>14 Q. Do you see that?</p> <p>15 A. I see that.</p> <p>16 Q. They're all listed as white except</p> <p>17 for Joseph Hui, who is Asian, right?</p> <p>18 A. That's what the document says, yes.</p> <p>19 Q. And none of those individuals were</p> <p>20 impacted in connection with the RIF, right?</p> <p>21 A. No.</p> <p>22 Q. Now, do you have any reason to</p> <p>23 disagree that Suzette Walker had 37 years of</p> <p>24 service?</p>
<p style="text-align: right;">62</p> <p>1 BY MS. BURKE:</p> <p>2 Q. You can read the whole email string</p> <p>3 if you want but I'm just focusing on the first</p> <p>4 one that you're reading now.</p> <p>5 A. All right.</p> <p>6 Q. Do you remember her sharing that?</p> <p>7 A. Yeah.</p> <p>8 Q. Do you know if, in fact, that was an</p> <p>9 opinion that was shared by your employees, that</p> <p>10 if they had more years of service, that they</p> <p>11 would be targeted for a RIF?</p> <p>12 A. No, this was, I mean -- this is</p> <p>13 something I was thinking of doing, you know, to</p> <p>14 congratulate people on service anniversaries</p> <p>15 and the concern was, you know, just -- I don't</p> <p>16 even know. I'm just trying to reread this but</p> <p>17 it doesn't make a whole lot of sense. It was</p> <p>18 just comments around concerns of what people</p> <p>19 may think when they hear that someone has X,</p> <p>20 you know, number of years of service.</p> <p>21 Q. I saw the preceding email strings.</p> <p>22 Those charts for Gross, Exhibit Gross-2,</p> <p>23 A. For Carl or Brian.</p> <p>24 Q. You can put them together. Every</p>	<p style="text-align: right;">64</p> <p>1 A. I have no idea.</p> <p>2 Q. Do you have any reason to disagree</p> <p>3 with that?</p> <p>4 A. No.</p> <p>5 Q. If you do, I can give you a</p> <p>6 spreadsheet. I'm just trying to save you the</p> <p>7 time.</p> <p>8 A. No, I'm just saying I have no idea.</p> <p>9 Q. If I represent to that to you, will</p> <p>10 you agree with me for purposes of questioning</p> <p>11 or do you want to look at the spreadsheet?</p> <p>12 MR. BARRAS: I'm going to object.</p> <p>13 The documents say what they say. Why</p> <p>14 don't we ask the questions and we'll</p> <p>15 see if we need to go any further.</p> <p>16 BY MS. BURKE:</p> <p>17 Q. You can look at the numbers for the</p> <p>18 years of service, but other than service Scott</p> <p>19 Panicelli, she had more years of service than</p> <p>20 every single one of them, right?</p> <p>21 MR. BARRAS: Objection.</p> <p>22 THE WITNESS: Based on what you</p> <p>23 were saying, yes.</p> <p>24 BY MS. BURKE:</p>

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<p style="text-align: right;">65</p> <p>1 Q. If you look at those individuals for 2 Carl Gross' team, they're all listed as white 3 except for Alex Ramos, who is Hispanic, right? 4 MR. BARRAS: Objection. You can 5 answer. 6 THE WITNESS: That's correct. 7 BY MS. BURKE: 8 Q. Then other than the top three people 9 here on the list, would you agree with me that 10 Ms. Walker had more years of service than all 11 the other employees listed on this list? 12 MR. BARRAS: Objection. Document 13 speaks for itself. You can answer. 14 THE WITNESS: It was 37.3, you 15 said, right, for Ms. Walker? 16 MS. BURKE: I think that's 17 accurate but I said 37. 18 THE WITNESS: Then yes, 19 everything below 37.7. 20 BY MS. BURKE: 21 Q. Ed Macintosh, do you know who that 22 was? He's not on the list. He was under Mr. 23 Gross during this period of time. Do you know 24 who he is?</p>	<p style="text-align: right;">67</p> <p>1 * * * 2 (Witness excused.) 3 * * * 4 (Deposition concluded at 5 3:44 p.m.) 6 * * *</p>
<p style="text-align: right;">66</p> <p>1 A. Yeah. 2 Q. He ultimately voluntarily separated 3 from Verizon, do you recall that? 4 A. I do. 5 Q. Had you ever met Ed Macintosh before? 6 A. Probably. 7 Q. Do you know what he looks like would 8 you know if you fell over him? 9 A. Probably, not. 10 Q. Do you know if he's white, black 11 Hispanic? 12 A. I don't. 13 MS. BURKE: Mr. Muccilo, I don't 14 have any further questions for you. 15 Your counsel may and he may not. 16 MR. BARRAS: I'm going to take a 17 two-minute break. Let me think about 18 it while I'm out. 19 * * * 20 (Whereupon, a brief recess was 21 held at this time.) 22 * * * 23 MR. BARRAS: I have no follow-up 24 questions.</p>	<p style="text-align: right;">68</p> <p>1 * * * 2 C E R T I F I C A T I O N 3 * * * 4 I, Hope Agosto, Professional Court 5 Reporter and Notary Public for the Commonwealth 6 of Pennsylvania, do hereby certify the 7 foregoing to be a true and accurate transcript 8 of my original stenographic notes taken at the 9 time and place hereinbefore set forth. 10 11 12 13 14 Hope Agosto 15 Court Reporter 16 Notary Public 17 18 19 20 (The foregoing certification of this 21 transcript does not apply to any reproduction 22 of the same by any means, unless under direct 23 control and/or supervision of the certifying 24 reporter.)</p>

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Exhibit G

Condensed Transcript
Testimony of:

CARL FRANK GROSS

Date: August 24, 2016

Suzette Walker v. Verizon Services Corporation, et al.

No.: USDC E.D.PA 15-4031

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Pages 1 to 4

Page 1	Page 3
<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p>3 * * *</p> <p>4 SUZETTE WALKER :</p> <p>5 v. :</p> <p>6 VERIZON SERVICES CORPORATION : and :</p> <p>7 VERIZON PENNSYLVANIA, INC. : NO. 15-4031</p> <p>8</p> <p>9 * * *</p> <p>10 August 24, 2016</p> <p>11 * * *</p> <p>12</p> <p>13 Oral deposition of CARL FRANK GROSS</p> <p>14 held in the Law Offices of Karpf, Karpf &</p> <p>15 Cerutti, PC, 3331 Street Road, Two Greenwood</p> <p>16 Square, Suite 128, Bensalem, Pennsylvania</p> <p>17 19020, commencing at 10:16 a.m., on the above</p> <p>18 date, before Hope Agosto, a Professional Court</p> <p>19 Reporter and a Notary Public.</p> <p>20</p> <p>21 * * *</p> <p>22 R&K REPORTING</p> <p>23 Court Reporting Services</p> <p>24 PO Box 1372</p> <p>Levittown, Pennsylvania 19058-1372</p> <p>Phone (215) 946-7009 Fax (215) 949-1867</p>	<p>1 * * *</p> <p>2 INDEX</p> <p>3 * * *</p> <p>4 WITNESS PAGE NO.</p> <p>5 CARL FRANK GROSS</p> <p>6 By Ms. Burke 5</p> <p>7 By Mr. Barras 70</p> <p>8</p> <p>9 * * *</p> <p>10 EXHIBITS</p> <p>11 * * *</p> <p>12 NO. DESCRIPTION PAGE NO.</p> <p>13 Gross-1 2/4/15 Email re: Open SR 15 Daily Report</p> <p>14</p> <p>15 Gross-2 Spreadsheet 24</p> <p>16 Gross-3 Stinson 2013 Year-End Performance Review 48</p> <p>17 Gross-4 Boudman 2014 Year-End Performance Review 50</p> <p>18 Gross-5 Mulhern 2014 Year-End Performance Review 51</p> <p>19 Gross-6 Portion of Capizzi Performance Review 54</p> <p>20</p> <p>21 Gross-7 Portion of Dehaven Performance Review 56</p> <p>22</p> <p>23 Gross-8 Ramos 2014 Year-End Performance Review 60</p> <p>24</p>
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<p>1 A P P E A R A N C E S:</p> <p>2</p> <p>3 KARPf, KARPf & CERUTTI, PC</p> <p>4 BY: CHRISTINE E. BURKE, ESQUIRE</p> <p>5 3331 Street Road</p> <p>6 Two Greenwood Square</p> <p>7 Suite 128</p> <p>8 Bensalem, Pennsylvania 19020</p> <p>9 (215) 639-0801</p> <p>10 CBurke@karpf-law.com</p> <p>11 -- Counsel for the Plaintiff</p> <p>12</p> <p>13 REED SMITH, LLP</p> <p>14 BY: JOEL S. BARRAS, ESQUIRE</p> <p>15 Three Logan Square</p> <p>16 1717 Cherry Street</p> <p>17 Suite 3100</p> <p>18 Philadelphia, Pennsylvania 19103</p> <p>19 (215) 241-7990</p> <p>20 JBarras@reedsmith.com</p> <p>21 -- Counsel for the Defendants</p> <p>22</p> <p>23 A L S O P R E S E N T:</p> <p>24 HARVETTA NERO, ESQUIRE</p> <p>-- Assistant General Counsel, Verizon</p>	<p>1 * * *</p> <p>2 EXHIBITS</p> <p>3 * * *</p> <p>4 NO. DESCRIPTION PAGE NO.</p> <p>5 Gross-9 Stinson 2014 Year-End Performance Review 61</p> <p>6</p> <p>7 Gross-10 Wojton 2014 Year-End Performance Review 62</p> <p>8</p> <p>9 Gross-11 Rennie 2013 Year-End Performance Review 66</p> <p>10</p> <p>11 (MARKED DURING PREVIOUS DEPOSITIONS)</p> <p>12</p> <p>13 Verizon-14 Rate and Rank RIF Documents 70</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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Pages 5 to 8

<p style="text-align: right;">Page 5</p> <p>1 * * *</p> <p>2 (It is hereby stipulated and</p> <p>3 agreed by and between counsel for the</p> <p>4 respective parties that the signing,</p> <p>5 sealing, filing and certification are</p> <p>6 waived; and that all objections, except</p> <p>7 as to the form of the question, be</p> <p>8 reserved until the time of trial.)</p> <p>9 * * *</p> <p>10 CARL FRANK GROSS, after having</p> <p>11 been first duly sworn, was examined and</p> <p>12 testified as follows:</p> <p>13 * * *</p> <p>14 EXAMINATION</p> <p>15 * * *</p> <p>16 BY MS. BURKE:</p> <p>17 Q. Mr. Gross, we're going to get started</p> <p>18 with your deposition. I know that I introduced</p> <p>19 myself off the record but just for purposes of</p> <p>20 the record, my name is Christine Burke and I</p> <p>21 represent Suzette Walker in a civil lawsuit</p> <p>22 that she's brought against her former employer,</p> <p>23 Verizon. Okay?</p> <p>24 A. Okay.</p>	<p style="text-align: right;">Page 7</p> <p>1 but at a later date, there will be a dispute</p> <p>2 over what your actual answer was. Okay?</p> <p>3 A. Got you.</p> <p>4 Q. When you leave here, you'll be saying</p> <p>5 yes or no out loud all day, but I'm sure your</p> <p>6 counsel will remind you.</p> <p>7 A. Okay.</p> <p>8 Q. During the course of the deposition,</p> <p>9 your counsel may be making objections. He and</p> <p>10 I will resolve the issue, but when you hear an</p> <p>11 objection, then just stop testifying because</p> <p>12 Hope can only type down what one person is</p> <p>13 saying at a time. Okay?</p> <p>14 A. Okay.</p> <p>15 Q. You may anticipate what my question</p> <p>16 is before I even get it out of my mouth, but</p> <p>17 let me get my question on the record before you</p> <p>18 answer. Okay?</p> <p>19 A. Okay.</p> <p>20 Q. And I'll try not to interrupt you as</p> <p>21 well. There were a very large number of</p> <p>22 documents produced during the course of</p> <p>23 discovery. There may be some exhibits which I</p> <p>24 will show you today, but if I do, you're</p>
<p style="text-align: right;">Page 6</p> <p>1 Q. Have you ever had your deposition</p> <p>2 taken before?</p> <p>3 A. Yes.</p> <p>4 Q. When was the most recent occasion?</p> <p>5 A. Maybe a year ago.</p> <p>6 Q. Was it in connection with your</p> <p>7 employment with Verizon or for personal</p> <p>8 reasons?</p> <p>9 A. It was with Verizon.</p> <p>10 Q. And what was the nature of the suit?</p> <p>11 A. A pole hit.</p> <p>12 Q. Any other occasions that you have</p> <p>13 been deposed in a civil lawsuit?</p> <p>14 A. No.</p> <p>15 Q. Roughly a year ago isn't too far</p> <p>16 back, so I'm sure you understand how the</p> <p>17 process works, right?</p> <p>18 A. Uh-huh.</p> <p>19 Q. So I'm just going to reiterate the</p> <p>20 short version of the instructions so we can get</p> <p>21 out of here. You just said uh-huh. We don't</p> <p>22 want there to be any confusion or arguments</p> <p>23 about what the nature of your response was. So</p> <p>24 if you say to me uh-huh, I get you right now,</p>	<p style="text-align: right;">Page 8</p> <p>1 allowed to take the opportunity to review them</p> <p>2 and take as much time as you need before you</p> <p>3 answer any questions. Okay?</p> <p>4 A. Okay.</p> <p>5 Q. If you don't understand one of my</p> <p>6 questions, you can let me know that. Nobody is</p> <p>7 asking you to guess or speculate, but you can</p> <p>8 give estimates in anything that you have a</p> <p>9 rationale basis for answering. Okay?</p> <p>10 A. Okay.</p> <p>11 Q. If you need a break at any point, you</p> <p>12 can do that. The only I would ask is that you</p> <p>13 answer the question that's on the table before</p> <p>14 you leave the room. All right?</p> <p>15 A. Okay.</p> <p>16 Q. Are you currently employed with</p> <p>17 Verizon?</p> <p>18 A. I am.</p> <p>19 Q. What's your position right now, Mr.</p> <p>20 Gross?</p> <p>21 A. Manager of engineering.</p> <p>22 Q. How long have you held that specific</p> <p>23 title?</p> <p>24 A. Since 1999.</p>

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Pages 9 to 12

<p style="text-align: right;">Page 9</p> <p>1 Q. Are you assigned a particular 2 geographic region? 3 A. I am. 4 Q. What is that right now? 5 A. Eastern north Pennsylvania. 6 Q. How long have you been assigned the 7 eastern north Pennsylvania region? 8 A. 15 years. 9 Q. Has the scope of that geographic 10 location changed in any way over the last 15 11 years? 12 A. Yes. 13 Q. At what point in time did it change? 14 A. Five years ago the area got larger. 15 Q. The scope of your geographic location 16 now, is it fairly the same as it was in early 17 2015? 18 A. When you say scope of the -- 19 Q. What geographic areas you're 20 responsible for overseeing as the manager of 21 engineering. 22 A. Five years ago it grew but the 23 responsibility is the same, just the area got 24 larger.</p>	<p style="text-align: right;">Page 11</p> <p>1 A. Yes. 2 Q. How often do you have a full team 3 meeting with your engineers, if at all? 4 A. We meet in the office once a week on 5 Tuesday and generally have a staff meeting once 6 a month. 7 Q. This Tuesday weekly meeting, how long 8 have you been doing that for? 9 A. For two years. 10 Q. So if we're in August 2016, did you 11 start doing that sometime in or about August of 12 2014? 13 A. Closer to July, I believe. July of 14 2014 is when they made us go hoteling, where we 15 meet once a week in the office and stay remote 16 four days. 17 Q. Now, the staff meeting that occurs 18 once a month, is there a different purpose for 19 that meeting? 20 A. No. 21 Q. Does it include any other employees 22 than those assigned to your team in the eastern 23 north Pennsylvania region? 24 A. Yes.</p>
<p style="text-align: right;">Page 10</p> <p>1 Q. Well, five years ago the area got 2 larger, correct? 3 A. Correct. 4 Q. From five years through now has the 5 geographic region gotten any larger than it did 6 five years ago? 7 A. No. 8 Q. So it's remained pretty consistent 9 over the past five years in terms of the areas 10 that you're responsible for overseeing? 11 A. Yes. 12 Q. You have a team of engineers that 13 report to you? 14 A. Yes. 15 Q. The number has fluctuated over the 16 years, correct? 17 A. Yes. 18 Q. What do you consider your job 19 responsibilities as the manager of engineering 20 for eastern north Pennsylvania? 21 A. Budgets, job accuracy, customer care. 22 That's pretty much the scope of the job. 23 Q. Do any of your employees work 24 remotely?</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. What additional employees does it 2 include? 3 A. Supporting personnel for my 4 engineers. 5 Q. So just using Mr. Magee, you know who 6 Brian Magee is? 7 A. I do. 8 Q. Your weekly meetings, do they include 9 him or his team members? 10 A. No. 11 Q. Staff meetings once a month, do they 12 include Mr. Magee or his team members? 13 A. No. 14 Q. You identified that some of the your 15 engineers work remotely. Do you work remotely? 16 A. Four out of five days. 17 Q. From your home? 18 A. Yes. 19 Q. How long has that been true for, sir? 20 A. Since July of 2014. 21 Q. Just generally speaking, prior to 22 July of 2014, did you simply work remotely as 23 business needs dictated? 24 A. Yes.</p>

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Pages 13 to 16

<p style="text-align: right;">Page 13</p> <p>1 Q. Would it be fair to say you were in 2 the office more prior to July of 2014? 3 A. Absolutely. 4 Q. The nature in which you monitored 5 your engineers' work performance, were there a 6 series of reports generated on either a daily, 7 weekly or monthly basis? 8 A. Yes. 9 Q. What types of reports would you look 10 at in order to monitor the success of your 11 engineers and the SRs that they were working on 12 or handling? 13 A. Spreadsheets that provide service 14 order intervals. 15 Q. Anything that reflects the SR 16 interval? 17 A. Job status, budgets. 18 Q. Did you associate a particular name 19 to any of these reports? 20 A. Say that again. 21 Q. Did you call the reports anything or 22 just what you're using right now during the 23 deposition? 24 A. No particular name.</p>	<p style="text-align: right;">Page 15</p> <p>1 * * * 2 (Whereupon, Exhibit Gross-1 was 3 marked for identification.) 4 * * * 5 BY MS. BURKE: 6 Q. Mr. Gross, take a look at that email 7 before we take a look at the spreadsheet that 8 was attached to it. This is an email dated 9 February 4th, 2015 to James Dewey and it 10 appears that you were copied on this email in 11 the cc area, if you take a look there. For the 12 record, this is Bates stamped 1032 to 1033. 13 Who is James Dewey, sir? 14 A. He is a report specialist. 15 MR. BARRAS: I have a question. 16 The third page on this looks like 17 it's from unrelated. 18 MS. BURKE: I don't even have a 19 third page. Just rip that off. 20 BY MS. BURKE: 21 Q. Mr. Dewey is a report specialist? 22 A. Yes. 23 Q. It appears that the individuals 24 listed in the to section, these are various</p>
<p style="text-align: right;">Page 14</p> <p>1 Q. When you say job status, is that the 2 same thing as when you would get a report 3 reflecting open SRs? 4 A. Sort of. That's one of the reports. 5 Q. The report you first identified for 6 SR intervals, would you be able to see the 7 averages for varying engineer managers under 8 Muccilo? 9 A. Yes. 10 Q. So you didn't just have access to how 11 your own team was doing; you could see how 12 other teams were doing as well, right? 13 A. Yes. 14 Q. That's also true with the report for 15 open SRs, right? 16 A. Yes. 17 Q. Same thing with budgets? 18 A. Yes. 19 Q. I just want to discuss one particular 20 example report. I don't have any other things 21 that we'll need to do on this computer, so I'd 22 like to get it out of the way. Just for the 23 record, we're looking at a spreadsheet that was 24 marked during discovery as DEF Walker 1034.</p>	<p style="text-align: right;">Page 16</p> <p>1 team members under certain engineering manager, 2 correct? 3 A. That would be correct. 4 Q. It includes people within your team 5 but also people from Mr. Magee's team as an 6 example? 7 A. Yes. 8 Q. This attachment is labeled SR open 9 daily report. Do you see that, for 10 attachments? 11 A. Yes. 12 Q. Would you get an SR open report on a 13 daily basis? 14 A. Yes. 15 Q. Would it be generally from Mr. Dewey? 16 A. Yes. 17 Q. And just from your perspective, when 18 you would get these types of reports, what 19 exactly were you looking for? 20 A. Well, I would usually concentrate on 21 my team and take a look at the status of the 22 jobs. 23 Q. If you go to dashboard SR details, 24 that particular tab.</p>

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<p>1 A. Okay.</p> <p>2 Q. It will identify for you this report</p> <p>3 at least by engineer, so those are the</p> <p>4 individuals on your team and it looks like</p> <p>5 other team members as well, right?</p> <p>6 A. Correct.</p> <p>7 Q. And it identifies these are all open</p> <p>8 reports; is that correct?</p> <p>9 A. I believe they're all open SRs.</p> <p>10 Q. So when you are able to view that</p> <p>11 there is, in fact, an open report, I guess</p> <p>12 you're looking for what the rationale is for</p> <p>13 why that report may still remain open?</p> <p>14 A. Yes.</p> <p>15 Q. When your engineers handle a</p> <p>16 particular SR or when they handle it's called,</p> <p>17 what, LOC, when they actually complete it? An</p> <p>18 SR is a service request, right, from a</p> <p>19 customer?</p> <p>20 A. That's correct.</p> <p>21 Q. When they handle it and they're not</p> <p>22 able to complete it within the particular time</p> <p>23 interval expected, are they supposed to put</p> <p>24 some kind of notes in the system as to what the</p>	<p>1 that's reflected in orange, you're not sure</p> <p>2 what that means?</p> <p>3 A. No. I'm not sure what the red means</p> <p>4 either, but based on other stuff, red usually</p> <p>5 means late.</p> <p>6 Q. If you go to the tab for SR open</p> <p>7 daily report, if you go to the very top of this</p> <p>8 spreadsheet, there's columns all the way</p> <p>9 through T. Up to T, it will just say FAC</p> <p>10 verification days.</p> <p>11 A. Uh-huh.</p> <p>12 Q. Do you see that? Sorry, you have to</p> <p>13 say yes or no out loud.</p> <p>14 A. I see it, yes.</p> <p>15 Q. Is that the number of days pending</p> <p>16 between when the service request was initiated</p> <p>17 and how long it's been open for?</p> <p>18 A. Yes.</p> <p>19 Q. With respect to these daily reports,</p> <p>20 you're able to see how stale they are, right?</p> <p>21 A. Yes.</p> <p>22 Q. Now, the first tab average facility</p> <p>23 verification days, this is part of the daily</p> <p>24 report that you would receive, right, sir?</p>
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<p>1 basis for the delay is?</p> <p>2 A. Yes.</p> <p>3 Q. Now, just looking at this report as a</p> <p>4 general example from early February 2015, do</p> <p>5 you recognize any of your team members on here?</p> <p>6 A. I do see one.</p> <p>7 Q. Is Mr. Chirag Jagwani one of your</p> <p>8 team members?</p> <p>9 A. He was.</p> <p>10 Q. Would you get notification of an open</p> <p>11 report from one of your team members on a daily</p> <p>12 basis or are there occasions where your team</p> <p>13 might not show up at all?</p> <p>14 A. They would show up generally on this</p> <p>15 report, because on any given day there has to</p> <p>16 be service requests in there.</p> <p>17 Q. The reflection of the either red,</p> <p>18 yellow or orange, what does that mean to you?</p> <p>19 A. I don't know. Based on this, it</p> <p>20 looks like red would be late, yellow getting</p> <p>21 close to being late, and I'm not even sure what</p> <p>22 brown is. This is not the way it's handled</p> <p>23 anymore.</p> <p>24 Q. I don't want you to guess so the one</p>	<p>1 A. Yes.</p> <p>2 Q. And based on this, you're able to see</p> <p>3 for each particular manager of engineering the</p> <p>4 average and the individual lag time for each of</p> <p>5 their respective engineers, right?</p> <p>6 A. Yes.</p> <p>7 Q. Looking at this particular report,</p> <p>8 these averages associated with each person --</p> <p>9 so you, it looks like you're 15.38. Do you</p> <p>10 see?</p> <p>11 A. Yes.</p> <p>12 Q. And Magee is 16.30. Do you see that?</p> <p>13 MR. BARRAS: We just lost it.</p> <p>14 * * *</p> <p>15 (Whereupon, a brief recess was</p> <p>16 held at this time.)</p> <p>17 * * *</p> <p>18 BY MS. BURKE:</p> <p>19 Q. I was just looking at the averages</p> <p>20 with you.</p> <p>21 A. Yes.</p> <p>22 Q. Just to make sure that we're talking</p> <p>23 about the same area of the document, your</p> <p>24 average here is 15.38?</p>

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<p>1 A. Yes.</p> <p>2 Q. We go down to Magee, his is 16.30,</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. So your team, on average, was doing a</p> <p>6 little better, right?</p> <p>7 A. Yes.</p> <p>8 Q. These, would you get every day?</p> <p>9 A. I believe so.</p> <p>10 Q. Now, we'll get into it because you</p> <p>11 reference it in some of your performance</p> <p>12 evaluations for your team members, would you</p> <p>13 get averages for the entire district each</p> <p>14 quarter?</p> <p>15 A. Daily, because it comes on this</p> <p>16 report.</p> <p>17 Q. So if you go to the very bottom it</p> <p>18 says grand total?</p> <p>19 A. Yes.</p> <p>20 Q. Do you see the 16.26?</p> <p>21 A. Yes.</p> <p>22 Q. Is that for the entire district?</p> <p>23 A. I would say yes.</p> <p>24 Q. So on any given day, could you see</p>	<p>1 A. Yes.</p> <p>2 Q. How long had you known her within the</p> <p>3 Verizon organization?</p> <p>4 MR. BARRAS: From what time</p> <p>5 point? Could you define what you're</p> <p>6 talking about?</p> <p>7 BY MS. BURKE:</p> <p>8 Q. Total, how long had you known her?</p> <p>9 A. I'd say from the mid 1990s is a</p> <p>10 guesstimate.</p> <p>11 Q. Had you ever submitted any complaints</p> <p>12 to anyone at Verizon on her behalf?</p> <p>13 A. No.</p> <p>14 Q. Had you given any negative feedback</p> <p>15 to any of her managers since the 1990s</p> <p>16 regarding her work performance?</p> <p>17 A. No.</p> <p>18 Q. Had you formed an opinion one way or</p> <p>19 the another whether or not you thought she was</p> <p>20 an honest or dishonest employee?</p> <p>21 A. No.</p> <p>22 Q. No, you had not formed an opinion,</p> <p>23 correct?</p> <p>24 A. No, I had not formed an opinion.</p>
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<p>1 the average for the entire district?</p> <p>2 A. Yes.</p> <p>3 Q. Now, in addition to any daily</p> <p>4 reports, did you get a summary of any kind of</p> <p>5 monthly averages that you could use when you</p> <p>6 started to do performance reviews?</p> <p>7 A. Yes.</p> <p>8 Q. At any point in time did you directly</p> <p>9 supervise Suzette Walker?</p> <p>10 A. No.</p> <p>11 Q. At any point in time did you complete</p> <p>12 any actual performance evaluations for her?</p> <p>13 A. No.</p> <p>14 Q. With respect to either her 2013 or</p> <p>15 2014 year end reviews, did you help Mr. Magee</p> <p>16 complete those evaluations?</p> <p>17 A. No.</p> <p>18 Q. Once you started working remotely on</p> <p>19 a regular basis beginning in or about July of</p> <p>20 2014, how often, if at all, did you see Suzette</p> <p>21 Walker?</p> <p>22 A. Maybe once a year.</p> <p>23 Q. You knew who Suzette Walker was</p> <p>24 though, right?</p>	<p>1 Q. Did you form an opinion one way or</p> <p>2 the other whether or not she was a good team</p> <p>3 player?</p> <p>4 A. No.</p> <p>5 Q. No, you had not formed an opinion?</p> <p>6 A. No, I had not formed an opinion.</p> <p>7 Q. I asked you about honesty, but had</p> <p>8 you formed any opinion one way or another about</p> <p>9 her sense of integrity?</p> <p>10 A. No.</p> <p>11 * * *</p> <p>12 (Whereupon, Exhibit Gross-2 was</p> <p>13 marked for identification.)</p> <p>14 * * *</p> <p>15 BY MS. BURKE:</p> <p>16 Q. In lieu of the entire spreadsheet,</p> <p>17 which reflected a headcount in 2015 for every</p> <p>18 single person under Muccilo's indirect</p> <p>19 supervision, this is a spreadsheet that was</p> <p>20 toggled just based on supervisors, so if you</p> <p>21 look at the first sheet, it just reflects those</p> <p>22 individuals on Mr. Magee's team. Do you see</p> <p>23 that?</p> <p>24 A. Yes, I do.</p>

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<p>1 Q. Then if you look at the second sheet, 2 it has your name there under supervisor name. 3 Do you see that? 4 A. Yes. 5 Q. Now, first of all, focusing on your 6 spreadsheet, which is the second page, Ed 7 Macintosh isn't reflected here and I'm still 8 working to get his personnel information in 9 terms of dates of employment, et cetera. When 10 was he actually on your team? 11 A. I believe 2013 or 2014 he started 12 working for me and I don't know the exact date. 13 Q. Then, did he voluntarily resign from 14 Verizon in the fall of 2015? 15 A. Yes, he did. 16 Q. A retirement package or something? 17 A. Yes. 18 Q. From in or about 2013 through 2014 he 19 remained on your team through his requirement? 20 A. Yes. 21 Q. Did you complete performance 22 evaluations for him like you did every other 23 team member? 24 A. Yes.</p>	<p>1 A. I have no need for them. 2 Q. In terms of the list of individuals 3 that you're overseeing on any particular basis, 4 do you maintain any sort of list? 5 A. The system does, so at any moment in 6 time I can click on my name and get a complete 7 listing of all the people that report to me. 8 Q. From a general headcount list? 9 A. From a Verizon perspective, I go to 10 the home page, I select my name and it shows 11 all the employees that report to me. 12 Q. Does that also show the specific 13 geographic locations they're assigned to 14 handle? 15 A. No. 16 Q. How, if at all, did you keep track of 17 the physical work areas that these engineers 18 were assigned to handle SRs for? 19 A. A separate spreadsheet. 20 Q. Was that your personal spreadsheet? 21 A. No. 22 Q. What was that? 23 A. Jim Dewey prepared a report for that. 24 Q. So Chirag joined your team before Ed</p>
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<p>1 Q. The gentleman whose name we looked at 2 a moment ago, Chirag Jagwani, you know who that 3 is? 4 A. Yes. 5 Q. Was he on your team at some point in 6 time? 7 A. Yes. 8 Q. What period of time, approximately? 9 A. I want to say from approximately 10 2008, 2009 time frame until probably 2014, 11 2015. 12 Q. So you're not exactly sure, right? 13 A. I'm not sure when he left or when he 14 came, but he was on the team for five, six, 15 seven years. 16 Q. What was the reason why he 17 transitioned off your team? 18 A. Why he left the team? 19 Q. Yes. 20 A. He went to Wireless. 21 Q. Do you keep organizational charts for 22 your team? 23 A. No. 24 Q. Why not?</p>	<p>1 MacIntosh, right? 2 A. Yes. 3 Q. Was Mr. MacIntosh the newest member 4 of your team in comparison to all these other 5 individuals on the list? 6 A. Yes. 7 Q. When he joined your team, he wasn't, 8 in fact, new to Verizon though, correct? 9 A. Correct. 10 Q. What department did he come from? 11 A. I believe it was the DRC, dispatch 12 reporting center. 13 Q. So in terms of Verizon seniority, do 14 you even know how many years of service he had? 15 A. Approximately 30 years. 16 Q. Which is more than some of these 17 people on your team though, right? 18 A. Yes. 19 Q. But in terms of team seniority, he 20 had the lowest seniority for your team, right? 21 A. Yes. 22 Q. How was it that the first 23 notification came to your attention that any 24 one may, in fact, have to be RIF'ed as it</p>

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<p>1 pertained to your team?</p> <p>2 A. A manager call.</p> <p>3 Q. By who?</p> <p>4 A. Joe Muccilo.</p> <p>5 Q. And approximately when did he give</p> <p>6 you a call to mention that a RIF might be</p> <p>7 occurring?</p> <p>8 A. Early part of 2015.</p> <p>9 Q. Before I get into what transpired</p> <p>10 thereafter, the actual internal discussions</p> <p>11 with upper management about exactly what the</p> <p>12 headcount would be the percentage of</p> <p>13 individuals who needed to be RIF'ed, were you</p> <p>14 privy to those conversations?</p> <p>15 A. No.</p> <p>16 Q. Bill Bragg, was he the executive</p> <p>17 director at the time over Mr. Muccilo?</p> <p>18 A. I believe so.</p> <p>19 Q. But you reported directly to Mr.</p> <p>20 Muccilo, correct?</p> <p>21 A. Yes.</p> <p>22 Q. So prior to the time that you</p> <p>23 received a phone call from your manager, Mr.</p> <p>24 Muccilo, respecting a RIF, you hadn't been</p>	<p>1 counterparts, did any of their team members</p> <p>2 volunteer?</p> <p>3 A. I don't know.</p> <p>4 Q. You weren't privy to that?</p> <p>5 A. No.</p> <p>6 Q. Did you soft canvas your team?</p> <p>7 A. Yes.</p> <p>8 Q. Any interest from anyone?</p> <p>9 A. No.</p> <p>10 Q. How did you go about soft canvassing</p> <p>11 your team? Did you send out a group email?</p> <p>12 How did you do it?</p> <p>13 A. Staff meeting, team meeting.</p> <p>14 Q. What did you say, there is going to</p> <p>15 be a RIF, is anyone looking to volunteer for an</p> <p>16 early retirement package or something?</p> <p>17 A. I advised there's a potential of a</p> <p>18 reduction in force coming, does anybody have</p> <p>19 any interest in leaving?</p> <p>20 Q. So was this at one of your weekly or</p> <p>21 monthly meetings?</p> <p>22 A. Yes.</p> <p>23 Q. During that initial call with Joe</p> <p>24 Muccilo, other than telling you to soft canvas</p>
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<p>1 involved any management transactions regarding</p> <p>2 headcounts and who may stay and who may go?</p> <p>3 A. No.</p> <p>4 Q. Tell me about your call with Mr.</p> <p>5 Muccilo.</p> <p>6 A. All the managers were on the call and</p> <p>7 it was announced that there was going to be a</p> <p>8 headcount reduction, otherwise known as RIF,</p> <p>9 reduction in force.</p> <p>10 Q. I know what it is. Is that all that</p> <p>11 was said on the call?</p> <p>12 A. Yes.</p> <p>13 Q. So he got all the managers on the</p> <p>14 call and said I want to let you know there's</p> <p>15 going to be headcount reduction?</p> <p>16 A. Yes.</p> <p>17 Q. Is that all he said?</p> <p>18 A. No.</p> <p>19 Q. What else, if anything, can you</p> <p>20 recall from that call?</p> <p>21 A. Soft canvas your team for any</p> <p>22 potential volunteers.</p> <p>23 Q. Respecting any of the other</p> <p>24 engineering managers that were your</p>	<p>1 your team for any potential volunteers, what,</p> <p>2 if anything, else did he relay during that</p> <p>3 call?</p> <p>4 A. I don't remember.</p> <p>5 Q. Did he give specific numbers?</p> <p>6 A. No.</p> <p>7 Q. Did he go at all beyond doing the</p> <p>8 inquiry about any volunteers?</p> <p>9 A. No.</p> <p>10 Q. How long after that call did you</p> <p>11 conduct a survey of your team?</p> <p>12 A. Within a week.</p> <p>13 Q. Did you report back?</p> <p>14 A. Yes.</p> <p>15 Q. How did you do that?</p> <p>16 A. I had no volunteers.</p> <p>17 Q. Right. How did you relay that to Mr.</p> <p>18 Muccilo?</p> <p>19 A. I don't remember. Either a phone</p> <p>20 call or I stopped in his office. I don't</p> <p>21 remember.</p> <p>22 Q. Did you and he work at the same</p> <p>23 location when you were, in fact, at the office?</p> <p>24 A. Yes.</p>

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<p>1 Q. Same floor?</p> <p>2 A. Yes.</p> <p>3 Q. What was the next conversation then</p> <p>4 that you had with Mr. Muccilo or when you</p> <p>5 reported to him you didn't have any volunteers,</p> <p>6 what was the nature of that discussion?</p> <p>7 A. I just told him I had no volunteers.</p> <p>8 Q. Did he say anything at that point?</p> <p>9 A. No.</p> <p>10 Q. Just took note of it?</p> <p>11 A. Yep.</p> <p>12 Q. When was the next conversation, if at</p> <p>13 all, that you had with Mr. Muccilo respecting a</p> <p>14 RIF, or is that the last you heard of it from</p> <p>15 him?</p> <p>16 A. Well, I had a discussion because we</p> <p>17 had to rank all the engineers from 1 to X and</p> <p>18 he had asked me who the bottom of the list was</p> <p>19 at a subsequent talk. I don't know exactly</p> <p>20 when that took place, but at some point he had</p> <p>21 asked me who my -- if I had to perform a RIF,</p> <p>22 who would be my candidate.</p> <p>23 Q. I just want to stay in chronological</p> <p>24 order as much as possible. You queried your</p>	<p>1 A. There wasn't any need to.</p> <p>2 Q. Mr. Muccilo did not direct you to do</p> <p>3 that?</p> <p>4 A. No.</p> <p>5 Q. No, he did not?</p> <p>6 A. No, he did not.</p> <p>7 Q. That you could just rank them</p> <p>8 informally?</p> <p>9 A. Yes.</p> <p>10 Q. What process were you given to rank</p> <p>11 your team members or did you come up with your</p> <p>12 own process?</p> <p>13 A. I come up with my own process.</p> <p>14 Q. Was your process seniority?</p> <p>15 A. No.</p> <p>16 Q. By seniority I mean the last one in</p> <p>17 on your team?</p> <p>18 A. That was one of the basis.</p> <p>19 Q. So it wasn't the only basis?</p> <p>20 A. Correct.</p> <p>21 Q. So you came up with your own system.</p> <p>22 One basis was team seniority, correct?</p> <p>23 A. Yes.</p> <p>24 Q. What were the other bases?</p>
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<p>1 team, no volunteers, right?</p> <p>2 A. Correct.</p> <p>3 Q. You reported that back to Muccilo?</p> <p>4 A. Yep.</p> <p>5 Q. At that time you don't recall any</p> <p>6 specific response that he had?</p> <p>7 A. Correct.</p> <p>8 Q. At that time did he tell you, well,</p> <p>9 then I need you to review your team members and</p> <p>10 rank them?</p> <p>11 A. At some point in time that happened.</p> <p>12 Q. The discussion that you had with Mr.</p> <p>13 Muccilo where you believe you were advised that</p> <p>14 you had to rank your team members, was that</p> <p>15 with anyone else on the call or in a meeting or</p> <p>16 that was a private conversation?</p> <p>17 A. Private conversation.</p> <p>18 Q. Did you, in fact, rank your team</p> <p>19 members?</p> <p>20 A. I did.</p> <p>21 Q. Did you work with an HR business</p> <p>22 partner to do that?</p> <p>23 A. No.</p> <p>24 Q. Why not?</p>	<p>1 A. Workload, response time on SRs,</p> <p>2 overall engineering knowledge.</p> <p>3 Q. Workload, does that specifically</p> <p>4 equate to number of SR requests?</p> <p>5 A. That's one aspect of workload.</p> <p>6 Q. What are any other aspects of</p> <p>7 workload?</p> <p>8 A. Volume of work orders issued.</p> <p>9 Q. Response time on SR, that's the FAC</p> <p>10 verification, right?</p> <p>11 A. Yes.</p> <p>12 Q. Measured daily, you could see it</p> <p>13 weekly, monthly, right?</p> <p>14 A. Correct.</p> <p>15 Q. And the whole district's average?</p> <p>16 A. Yes.</p> <p>17 Q. Any other criterion that you haven't</p> <p>18 identified for me?</p> <p>19 A. That's it.</p> <p>20 Q. Where did you put this information?</p> <p>21 A. Where did I put it? I didn't put it</p> <p>22 anywhere.</p> <p>23 Q. You had 15 team members at that time,</p> <p>24 right?</p>

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<p>1 A. I don't know. Did I?</p> <p>2 Q. If you look at Gross-2, the one for</p> <p>3 your particular team.</p> <p>4 MR. BARRAS: Do we have a date</p> <p>5 when this was applicable?</p> <p>6 MS. BURKE: For the record, I'll</p> <p>7 give you the Bates stamp number.</p> <p>8 THE WITNESS: This spreadsheet</p> <p>9 says '13.</p> <p>10 BY MS. BURKE:</p> <p>11 Q. Ed MacIntosh isn't on there, right?</p> <p>12 A. No, he's not.</p> <p>13 Q. Chirag Jagwani is not on there,</p> <p>14 right?</p> <p>15 A. No, he is not.</p> <p>16 MS. BURKE: Hold on one second so</p> <p>17 I can answer your counsel's question</p> <p>18 before we move on. Counsel, this</p> <p>19 documents were Bates stamped Walker</p> <p>20 818, which is a list of headcount</p> <p>21 that you provided to us for Mr.</p> <p>22 Muccilo during the time period in</p> <p>23 question.</p> <p>24 MR. BARRAS: I'm just going to</p>	<p>1 Q. What about Sam Capizzi?</p> <p>2 A. He was on the team.</p> <p>3 Q. What about EJ Battista?</p> <p>4 A. He was on the team.</p> <p>5 Q. What about Vincent Palwicki?</p> <p>6 A. Yes.</p> <p>7 Q. What about Paul Mulhern?</p> <p>8 A. Yes.</p> <p>9 Q. David Stinson?</p> <p>10 A. Yes.</p> <p>11 Q. What about James Rennie?</p> <p>12 A. Yes.</p> <p>13 Q. What about David Dehaven?</p> <p>14 A. Yes.</p> <p>15 Q. Alex Ramos?</p> <p>16 A. Yes.</p> <p>17 Q. He had actually come on your team</p> <p>18 from Mr. Magee's team, right?</p> <p>19 A. That's correct.</p> <p>20 Q. Mark Williams?</p> <p>21 A. No.</p> <p>22 Q. What about Edward Boudman?</p> <p>23 A. Yes.</p> <p>24 Q. Jeffrey Kramer?</p>
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<p>1 point out I think the time period in</p> <p>2 question was a broader span of time</p> <p>3 than the day of, the day before the</p> <p>4 reduction in force, so whatever time</p> <p>5 period is represented, I have no</p> <p>6 problem with him answering how many</p> <p>7 people were on his team. I just want</p> <p>8 to point out that it is not the</p> <p>9 number of people necessarily that he</p> <p>10 evaluated for part of the reduction.</p> <p>11 MS. BURKE: I'm going ask him</p> <p>12 that, but thank you for testifying</p> <p>13 for him.</p> <p>14 BY MS. BURKE:</p> <p>15 Q. Mr. Gross, was Ed MacIntosh part of</p> <p>16 your assessment of your RIF once no one</p> <p>17 volunteered?</p> <p>18 A. Yes.</p> <p>19 Q. Was Chirag Jagwani?</p> <p>20 A. I don't believe he was on the team at</p> <p>21 that time. But I don't remember when he left,</p> <p>22 so I can't really answer that adequately.</p> <p>23 Q. What about Ken Wojton?</p> <p>24 A. He was on the team.</p>	<p>1 A. Yes.</p> <p>2 Q. What about Barbara Whitham?</p> <p>3 A. No.</p> <p>4 Q. Now, when you say where did you keep</p> <p>5 it, what, if any, documentation do you have in</p> <p>6 the whole world that would show that you ranked</p> <p>7 these employees?</p> <p>8 A. There was a spreadsheet provided to</p> <p>9 us that we had to fill out.</p> <p>10 Q. That was from HR, right?</p> <p>11 A. No.</p> <p>12 Q. Who did it come from?</p> <p>13 A. I believe Diane Redilla.</p> <p>14 Q. Who is she?</p> <p>15 A. She works for Joe Muccilo and is the</p> <p>16 area integration manager.</p> <p>17 Q. The spreadsheet that you were asked</p> <p>18 to fill out, did it have the categories you</p> <p>19 were asked to assess?</p> <p>20 A. No.</p> <p>21 Q. What was in the spreadsheet then?</p> <p>22 A. The names and a column for ranking.</p> <p>23 Q. So just their name and the order in</p> <p>24 which you rank them?</p>

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<p>1 A. Correct.</p> <p>2 Q. I'm going to show you a spreadsheet</p> <p>3 and just let me know if you have ever seen it</p> <p>4 before or if this is the one that you're</p> <p>5 referring to. I don't believe it is but you</p> <p>6 can certainly let me know. That's Bates</p> <p>7 stamped DEF Walker 2651. Have you ever seen</p> <p>8 that before?</p> <p>9 A. No.</p> <p>10 Q. That's not the spreadsheet you're</p> <p>11 talking about that you filled in with your</p> <p>12 ranking of employees?</p> <p>13 A. No.</p> <p>14 Q. Did you turn it in to Diane Redilla</p> <p>15 or did you turn it in to Joe Muccilo?</p> <p>16 A. Diane Redilla.</p> <p>17 Q. Who ranked at the bottom?</p> <p>18 A. Ed Macintosh.</p> <p>19 Q. Who ranked at the top?</p> <p>20 A. I don't remember.</p> <p>21 Q. Did you keep a copy of that</p> <p>22 spreadsheet for yourself?</p> <p>23 A. Not sure.</p> <p>24 Q. Other than Redilla, who else did you</p>	<p>1 all, with any discussions related to the RIF?</p> <p>2 A. A discussion with Brian Magee.</p> <p>3 Q. Who initiated that call?</p> <p>4 A. I don't remember.</p> <p>5 Q. Was it a telephone call?</p> <p>6 A. Yes.</p> <p>7 Q. What happened during that call?</p> <p>8 A. We compared notes on the bottom two</p> <p>9 people from his group and my group.</p> <p>10 Q. Who were they?</p> <p>11 A. Suzette Walker from his group and Ed</p> <p>12 Macintosh from my group.</p> <p>13 Q. Between the two of you, did you</p> <p>14 determine that Suzette Walker would go or did</p> <p>15 Mr. Magee make that decision?</p> <p>16 A. Mr. Magee made that decision.</p> <p>17 Q. Do you know what her most recent FAC</p> <p>18 verification scores were at that time?</p> <p>19 A. No.</p> <p>20 Q. Did you know anything about her most</p> <p>21 recent performance evaluation?</p> <p>22 A. No.</p> <p>23 Q. Other than seniority, why did Ed</p> <p>24 Macintosh rank at the bottom of your group?</p>
Page 42	Page 44
<p>1 share it with?</p> <p>2 A. Nobody.</p> <p>3 Q. Did you ever share with it Mr.</p> <p>4 Muccilo?</p> <p>5 A. Well, Diane collected it for Jim</p> <p>6 Muccilo.</p> <p>7 Q. Did you ever personally share to it</p> <p>8 Mr. Muccilo?</p> <p>9 A. Me personally, no.</p> <p>10 Q. Did you email it to him, hand deliver</p> <p>11 it to him, anything like that?</p> <p>12 A. I don't believe so.</p> <p>13 Q. How do you know that Ms. Redilla</p> <p>14 actually gave it to Mr. Muccilo?</p> <p>15 A. I don't know that for a fact.</p> <p>16 Q. After you ranked your employees and</p> <p>17 sent it to Ms. Redilla, which you believe was</p> <p>18 sent to Mr. Muccilo, right?</p> <p>19 A. Correct.</p> <p>20 Q. Was that the sole involvement that</p> <p>21 you had with respect to the RIF in the spring</p> <p>22 of 2015?</p> <p>23 A. No.</p> <p>24 Q. What was your next involvement, if at</p>	<p>1 A. Least engineering knowledge at that</p> <p>2 point in time.</p> <p>3 Q. Was that based on education or</p> <p>4 experience within the engineering role?</p> <p>5 A. Experience within the engineering</p> <p>6 role.</p> <p>7 Q. In terms of the designation or the</p> <p>8 band, all of the individuals you supervised,</p> <p>9 they're band 7T, right?</p> <p>10 A. Correct.</p> <p>11 Q. The difference between an engineering</p> <p>12 4 specialist and engineering III, what is that?</p> <p>13 A. Engineering IV is the pay band is</p> <p>14 bigger.</p> <p>15 Q. Their salary is higher?</p> <p>16 A. The pay band is bigger.</p> <p>17 Q. Just looking at the individuals for</p> <p>18 your team on that spreadsheet that you have,</p> <p>19 Gross-2, you have some engineers III</p> <p>20 specialists, they're all a band 7T. You might</p> <p>21 understand your response a little better than I</p> <p>22 do.</p> <p>23 A. Pay band, their top salary could be</p> <p>24 -- is generally larger. So one might be 75 to</p>

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<p>1 100, the other would be 75 to 115.</p> <p>2 Q. The range?</p> <p>3 A. The range.</p> <p>4 Q. So you did complete RIF documentation</p> <p>5 for your team; you just don't have a copy of</p> <p>6 it?</p> <p>7 A. Yes.</p> <p>8 Q. Yes, you don't have a copy?</p> <p>9 A. Yes, I do not have a copy.</p> <p>10 Q. But you did create it, right?</p> <p>11 A. Yes.</p> <p>12 Q. During Mr. Magee's deposition, he was</p> <p>13 asked whether or not based on his conversations</p> <p>14 with you he knew if you ranked your team.</p> <p>15 Okay? I just want to read you his response</p> <p>16 which starts at Page 145, Line 20: All I know</p> <p>17 is what he told me. He said he picked Ed</p> <p>18 MacIntosh because he was the newest on his</p> <p>19 team. He felt like everyone on his team was,</p> <p>20 you know, great and he felt Ed was great. He</p> <p>21 just said he had no other way to split it.</p> <p>22 Is that true?</p> <p>23 MR. BARRAS: Objection. You can</p> <p>24 answer.</p>	<p>1 was at the bottom of the list is he</p> <p>2 had the least engineering experience</p> <p>3 at the time.</p> <p>4 BY MS. BURKE:</p> <p>5 Q. I want to go over some of your</p> <p>6 employees' performance evaluations with you.</p> <p>7 In your opinion, the most important aspect or</p> <p>8 the biggest goal for your team, was it the FAC</p> <p>9 verifications?</p> <p>10 A. Yes.</p> <p>11 Q. The SR interval. You had represented</p> <p>12 to Mr. Capizzi in his evaluation that it was</p> <p>13 the biggest goal of that year, correct?</p> <p>14 A. Yes.</p> <p>15 Q. For Alex Ramos, you told him FAC</p> <p>16 verification is the most important, right?</p> <p>17 A. Yes.</p> <p>18 Q. Did you, in fact, even suggest to any</p> <p>19 of your employees that they may have to, in</p> <p>20 fact, sacrifice on performance to cover the</p> <p>21 workload that was coming in?</p> <p>22 A. I'm not sure I understand that</p> <p>23 question.</p> <p>24 Q. That the FAC verification or getting</p>
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<p>1 BY MS. BURKE:</p> <p>2 Q. Is that true, sir?</p> <p>3 A. That sounds correct.</p> <p>4 Q. So did you pick Ed MacIntosh because</p> <p>5 he was the least senior on your team?</p> <p>6 A. Yes.</p> <p>7 Q. Thank you.</p> <p>8 You thought he was great, right?</p> <p>9 A. Yes.</p> <p>10 Q. You thought everyone on your team was</p> <p>11 great?</p> <p>12 A. Yes.</p> <p>13 Q. To be fair, you just said whoever is</p> <p>14 in the last one in the door?</p> <p>15 A. No.</p> <p>16 Q. No? So you did not pick him then</p> <p>17 because he was the least senior on your team?</p> <p>18 A. I picked him because he had the least</p> <p>19 engineering experience at the time.</p> <p>20 Q. So the level of time that he was on</p> <p>21 your team was not then the reason?</p> <p>22 MR. BARRAS: Object but you can</p> <p>23 answer.</p> <p>24 THE WITNESS: The reason why he</p>	<p>1 things done in a timely manner, they may have</p> <p>2 to sacrifice on work performance?</p> <p>3 A. I still don't follow the question.</p> <p>4 Q. I'll show you the evaluation. Okay?</p> <p>5 A. Okay.</p> <p>6 * * *</p> <p>7 (Whereupon, Exhibit Gross-3 was</p> <p>8 marked for identification.)</p> <p>9 * * *</p> <p>10 BY MS. BURKE:</p> <p>11 Q. This is Stinson's 2013 year end</p> <p>12 review and it appears that it was completed on</p> <p>13 February 17th, 2014, if you look at the very</p> <p>14 last page.</p> <p>15 MR. BARRAS: Object to that</p> <p>16 categorization of completed, but you</p> <p>17 can answer.</p> <p>18 THE WITNESS: I see that.</p> <p>19 BY MS. BURKE:</p> <p>20 Q. Did you complete this evaluation?</p> <p>21 A. Yes, I did.</p> <p>22 Q. For Mr. Stinson, right?</p> <p>23 A. Yes.</p> <p>24 Q. If you go to the second last page,</p>

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<p style="text-align: right;">Page 49</p> <p>1 which is Bates stamped Walker 1000.</p> <p>2 A. Okay.</p> <p>3 Q. The area that says Dave has had a</p> <p>4 very busy workload and works extremely hard to</p> <p>5 keep it under control. He feels frustrated</p> <p>6 sometimes, as he believes he is not giving our</p> <p>7 customers his best performance, but I remind</p> <p>8 him that workloads prevent that. Do you see</p> <p>9 that?</p> <p>10 A. Yes.</p> <p>11 Q. Did you identify that based on the</p> <p>12 workload, they may have to sacrifice actual</p> <p>13 performance?</p> <p>14 A. Yes.</p> <p>15 Q. Because no matter what, the thing</p> <p>16 that you emphasized, at least throughout these</p> <p>17 2013 year end reviews, was the SR interval,</p> <p>18 right?</p> <p>19 A. That was the first priority.</p> <p>20 Q. We can go into them, but with respect</p> <p>21 to some of your employees, you would identify</p> <p>22 what their ranking was within the district,</p> <p>23 right?</p> <p>24 A. The ranking within my group.</p>	<p style="text-align: right;">Page 51</p> <p>1 of our district. Do you see that?</p> <p>2 A. I do.</p> <p>3 Q. Is that solely for your team or is it</p> <p>4 the entire district in comparison to each</p> <p>5 manager that we saw on that chart earlier</p> <p>6 today?</p> <p>7 A. I don't know for sure.</p> <p>8 Q. So you can't tell me as we sit here</p> <p>9 right now whether or not 31 percent put him in</p> <p>10 the bottom of the entire district?</p> <p>11 A. No, I don't know that for sure.</p> <p>12 * * *</p> <p>13 (Whereupon, Exhibit Gross-5 was</p> <p>14 marked for identification.)</p> <p>15 * * *</p> <p>16 BY MS. BURKE:</p> <p>17 Q. This is a performance evaluation for</p> <p>18 Paul Mulhern for the 2014 year end review. It</p> <p>19 look likes it was completed by you.</p> <p>20 A. Yes.</p> <p>21 Q. Did you complete this document?</p> <p>22 A. I did.</p> <p>23 Q. If you go to the second to last page,</p> <p>24 which is Bates stamped 945.</p>
<p style="text-align: right;">Page 50</p> <p>1 * * *</p> <p>2 (Whereupon, Exhibit Gross-4 was</p> <p>3 marked for identification.)</p> <p>4 * * *</p> <p>5 BY MS. BURKE:</p> <p>6 Q. This is a 2014 year end performance</p> <p>7 review for Ed Boudman. It appears that you</p> <p>8 completed this, if you look at the last page.</p> <p>9 Did you, in fact, complete this evaluation?</p> <p>10 A. Yes, I did.</p> <p>11 Q. If you go to the second to last page</p> <p>12 Bates stamped 875, I'll direct your attention.</p> <p>13 Okay? Are you on Page 875?</p> <p>14 A. I am.</p> <p>15 Q. The second to last sentence says, one</p> <p>16 area I would like to see Ed improve on in the</p> <p>17 coming year is to increase his percentage of</p> <p>18 jobs issued within eight days of application.</p> <p>19 Do you see that?</p> <p>20 A. I do.</p> <p>21 Q. That's the FAC verification, right?</p> <p>22 A. That's correct.</p> <p>23 Q. Then you say his percentage this year</p> <p>24 was 31 percent, putting him in the bottom third</p>	<p style="text-align: right;">Page 52</p> <p>1 A. Okay.</p> <p>2 Q. This second paragraph where it starts</p> <p>3 with Paul does a good?</p> <p>4 A. Yes.</p> <p>5 Q. Paul does a good job of meeting all</p> <p>6 the metrics that we have in place, but one area</p> <p>7 that I need Paul to improve on is his eight day</p> <p>8 facility verification objective that is in</p> <p>9 place. Same sentiment that you expressed to</p> <p>10 Mr. Boudman, right?</p> <p>11 A. Correct.</p> <p>12 MR. BARRAS: Objection.</p> <p>13 BY MS. BURKE:</p> <p>14 Q. Paul's percentage for doing this is</p> <p>15 at 25 percent, which is the third lowest in the</p> <p>16 district. Do you see that?</p> <p>17 A. I do.</p> <p>18 Q. So his was actually worse than Mr.</p> <p>19 Boudman's, right?</p> <p>20 MR. BARRAS: Objection.</p> <p>21 THE WITNESS: Correct.</p> <p>22 BY MS. BURKE:</p> <p>23 Q. Same question with respect to this</p> <p>24 evaluation for Mr. Mulhern. This district</p>

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<p style="text-align: right;">Page 53</p> <p>1 you're referring to, is that all teams or is</p> <p>2 this just your team or you don't know?</p> <p>3 A. I don't know.</p> <p>4 Q. For some of your employees, you</p> <p>5 referenced within them that you would attach a</p> <p>6 PDF reflecting the results, I guess for their</p> <p>7 own verification purposes?</p> <p>8 A. Yes.</p> <p>9 MR. BARRAS: Objection.</p> <p>10 BY MS. BURKE:</p> <p>11 Q. Do you keep those accompanied with</p> <p>12 their evaluation?</p> <p>13 A. The system stores them.</p> <p>14 Q. If you went to go look at any of your</p> <p>15 employees' evaluations, whatever you attached</p> <p>16 to them would still be there, right?</p> <p>17 A. Yes.</p> <p>18 MR. BARRAS: Wait until I'm done</p> <p>19 objecting before you answer. Give me</p> <p>20 a minute to actually say a word and</p> <p>21 then you can answer.</p> <p>22 MS. NERO: The objection is</p> <p>23 actually important, just like what</p> <p>24 the question is.</p>	<p style="text-align: right;">Page 55</p> <p>1 Q. This is just a portion, because most</p> <p>2 of the evaluations you issued are very lengthy</p> <p>3 so we would have thousands of pages here.</p> <p>4 Other than Sam Capizzi, you didn't have any</p> <p>5 other Sams on your team, right?</p> <p>6 A. Correct.</p> <p>7 Q. This is just a portion of one of his</p> <p>8 evaluations bates stamped 879. Here you write</p> <p>9 in the manager comments area, the very last</p> <p>10 sentence, Sam utilize contractors as much as</p> <p>11 possible to get the jobs issued, therefore</p> <p>12 bringing in the revenue as soon as possible.</p> <p>13 Do you see that?</p> <p>14 MR. BARRAS: Im going to object.</p> <p>15 First, the document speaks for</p> <p>16 itself. More importantly, do we have</p> <p>17 the year that is?</p> <p>18 MS. BURKE: I'll pull it up for</p> <p>19 you. Do you want to see the whole</p> <p>20 evaluation, sir?</p> <p>21 MR. BARRAS: Do you need to see</p> <p>22 the whole evaluation or would you</p> <p>23 just be able to have the year?</p> <p>24 BY MS. BURKE:</p>
<p style="text-align: right;">Page 54</p> <p>1 THE WITNESS: Okay.</p> <p>2 BY MS. BURKE:</p> <p>3 Q. What emphasis, if any, did you place</p> <p>4 on your engineers' use of contractors to do</p> <p>5 work?</p> <p>6 A. I'm not sure I understand the</p> <p>7 question.</p> <p>8 Q. Did your engineers, in fact, use any</p> <p>9 contractors to assist in handling SRs?</p> <p>10 A. Yes.</p> <p>11 Q. What emphasis did you put on using</p> <p>12 contractors to get the jobs issued?</p> <p>13 A. I didn't put any emphasis. It's a</p> <p>14 tool for them to use.</p> <p>15 Q. A good tool, right?</p> <p>16 A. Yes.</p> <p>17 Q. It helps generate revenue quicker,</p> <p>18 right?</p> <p>19 A. It helps them get the job done.</p> <p>20 * * *</p> <p>21 (Whereupon, Exhibit Gross-6 was</p> <p>22 marked for identification.)</p> <p>23 * * *</p> <p>24 BY MS. BURKE:</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. I just want to ask you about your</p> <p>2 opinion on your engineers using contractors and</p> <p>3 what this phrase means, but if you want to see</p> <p>4 the entire evaluation, you can. Would you like</p> <p>5 to?</p> <p>6 A. No, I don't need the full evaluation.</p> <p>7 Q. The phrase that you stated, Sam</p> <p>8 utilizes contractors as much as possible to get</p> <p>9 the jobs, therefore bringing in the revenue as</p> <p>10 soon as possible, his use of contractors as</p> <p>11 much as possible, that was a good thing, right?</p> <p>12 A. Correct.</p> <p>13 Q. Because it helped generate revenue</p> <p>14 quickly?</p> <p>15 A. Yes.</p> <p>16 Q. That's all I was trying to find out.</p> <p>17 I just wanted to give you that paper to</p> <p>18 clarify.</p> <p>19 * * *</p> <p>20 (Whereupon, Exhibit Gross-7 was</p> <p>21 marked for identification.)</p> <p>22 * * *</p> <p>23 BY MS. BURKE:</p> <p>24 Q. This is a portion of Dave Dehaven's</p>

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<p>1 evaluation for 2013 year end. I just want to</p> <p>2 focus your attention to the middle area,</p> <p>3 there's a paragraph that's written that says</p> <p>4 Dave has also made an effort. Do you see where</p> <p>5 I'm at?</p> <p>6 A. Yes.</p> <p>7 Q. Dave has also made an effort to</p> <p>8 reduce costs but utilizing best practices, such</p> <p>9 as using contractors when possible. The</p> <p>10 effective use of contractors greatly reduces</p> <p>11 the overall cost of each work order. Do you</p> <p>12 agree with that?</p> <p>13 A. Yes.</p> <p>14 Q. Did each of your engineers have their</p> <p>15 own particular contractors they could work with</p> <p>16 or they had to share a certain number of</p> <p>17 contractors?</p> <p>18 A. We used a vendor who selected the</p> <p>19 contractor.</p> <p>20 Q. I do know that based on Mr. Magee's</p> <p>21 deposition. Let's just use Joe Smith. If</p> <p>22 there was a Joe Smith, could anyone on your</p> <p>23 team utilize him from the vendor based on their</p> <p>24 project?</p>	<p>1 Q. Good attendance.</p> <p>2 A. Yes.</p> <p>3 Q. You didn't discourage them from</p> <p>4 taking medical leave or anything, correct?</p> <p>5 A. No.</p> <p>6 Q. Gross-4, which is Boudman, do you</p> <p>7 have his?</p> <p>8 A. I do.</p> <p>9 Q. When your employees put actual</p> <p>10 comments in their performance review, do you</p> <p>11 read them?</p> <p>12 A. I do.</p> <p>13 Q. Do you discuss them with them?</p> <p>14 A. Yes.</p> <p>15 Q. On Page 872 of Boudman's 2014 year</p> <p>16 end review, in his employee</p> <p>17 accomplishments/status, do you see that?</p> <p>18 A. You said 872?</p> <p>19 Q. Yes.</p> <p>20 A. Yes.</p> <p>21 Q. He puts in 2014 I had zero motor</p> <p>22 vehicle accidents. Obviously, that's a good</p> <p>23 thing, right?</p> <p>24 A. Yes.</p>
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<p>1 A. It wouldn't be our call.</p> <p>2 Q. So it would based on the particular</p> <p>3 SR at issue?</p> <p>4 A. No, it was based on the vendor</p> <p>5 assigning it to a particular engineer or</p> <p>6 contractor.</p> <p>7 Q. In completing the assignment, the</p> <p>8 engineers reach out to vendor to identify that</p> <p>9 they need their services?</p> <p>10 A. Correct.</p> <p>11 * * *</p> <p>12 (Whereupon, there was an</p> <p>13 off-the-record discussion.)</p> <p>14 * * *</p> <p>15 BY MS. BURKE:</p> <p>16 Q. What emphasis, if any, did you place</p> <p>17 on positive attendance in terms of measuring</p> <p>18 your engineers' work performance?</p> <p>19 A. Say that again.</p> <p>20 Q. What emphasis did you put on positive</p> <p>21 attendance in terms of measuring your</p> <p>22 engineers' work?</p> <p>23 A. Positive attendance, you mean showing</p> <p>24 up, going to work?</p>	<p>1 Q. Do they have a company car that they</p> <p>2 drive?</p> <p>3 A. We have a fleet of cars.</p> <p>4 Q. That they're allowed to use for work</p> <p>5 purposes?</p> <p>6 A. Yes.</p> <p>7 Q. Then he says and zero medical</p> <p>8 absences. Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Was there any discussion, if at all,</p> <p>11 how medical absences impacted their</p> <p>12 performance?</p> <p>13 A. No.</p> <p>14 Q. So you don't know why he put that</p> <p>15 there?</p> <p>16 A. No.</p> <p>17 Q. He's allowed to take medical absence,</p> <p>18 right?</p> <p>19 A. He is.</p> <p>20 Q. He wouldn't be chastised for that?</p> <p>21 A. No.</p> <p>22 * * *</p> <p>23 (Whereupon, Exhibit Gross-8 was</p> <p>24 marked for identification.)</p>

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<p>1 * * *</p> <p>2 BY MS. BURKE:</p> <p>3 Q. This is for Alejandro Ramos for 2014</p> <p>4 year end. I just want to direct your attention</p> <p>5 to Page 975 under recognition. Do you see</p> <p>6 that?</p> <p>7 A. Page 975?</p> <p>8 Q. Yes. Page 975, are you on that page?</p> <p>9 A. I'm on that page.</p> <p>10 Q. Under fuel our culture, there's an</p> <p>11 employee accomplishments area.</p> <p>12 A. Yes.</p> <p>13 Q. This is what the employee fills out,</p> <p>14 right?</p> <p>15 A. Correct.</p> <p>16 Q. He says at the bottom, zero absences,</p> <p>17 100 percent perfect attendance, right?</p> <p>18 MR. BARRAS: Objection.</p> <p>19 THE WITNESS: Correct.</p> <p>20 * * *</p> <p>21 (Whereupon, Exhibit Gross-9 was</p> <p>22 marked for identification.)</p> <p>23 * * *</p> <p>24 BY MS. BURKE:</p>	<p>1 employee accomplishments. Do you see that?</p> <p>2 A. I do.</p> <p>3 Q. He talks about he attached a PDF for</p> <p>4 results. Do you see that? See attached PDF</p> <p>5 file for results.</p> <p>6 MR. BARRAS: Objection, but you</p> <p>7 can answer.</p> <p>8 THE WITNESS: I do.</p> <p>9 BY MS. BURKE:</p> <p>10 Q. I want to make sure we're on the same</p> <p>11 page. You seem hesitant. On Page 1020 under</p> <p>12 employee accomplishments/status, what's written</p> <p>13 there is see attached PDF file for results,</p> <p>14 right?</p> <p>15 A. Correct.</p> <p>16 Q. Did he attach something to his</p> <p>17 evaluation?</p> <p>18 A. He must have.</p> <p>19 Q. If he did, in fact, do that, would</p> <p>20 you have maintained that for personnel</p> <p>21 purposes?</p> <p>22 A. The system would store it.</p> <p>23 Q. You didn't throw it away or anything,</p> <p>24 right?</p>
Page 62	Page 64
<p>1 Q. This is for Stinson for 2014. Could</p> <p>2 you go to page 1005. Are you there?</p> <p>3 A. I'm there.</p> <p>4 Q. Fuel our culture under employee</p> <p>5 accomplishments, do the employees fill this</p> <p>6 out?</p> <p>7 A. Yes.</p> <p>8 Q. For his accomplishments, 100 percent</p> <p>9 attendance in 2014, right?</p> <p>10 MR. BARRAS: Objection. The</p> <p>11 document speaks for itself. You can</p> <p>12 answer.</p> <p>13 BY MS. BURKE:</p> <p>14 Q. Right, sir?</p> <p>15 A. Yes.</p> <p>16 * * *</p> <p>17 (Whereupon, Exhibit Gross-10 was</p> <p>18 marked for identification.)</p> <p>19 * * *</p> <p>20 BY MS. BURKE:</p> <p>21 Q. This is for Ken Wojton, page 1020.</p> <p>22 Are you there, sir?</p> <p>23 A. I'm there.</p> <p>24 Q. We're under fuel our culture,</p>	<p>1 A. No.</p> <p>2 Q. And he also writes there, attended 14</p> <p>3 training courses this year?</p> <p>4 A. No.</p> <p>5 Q. No motor vehicle accidents?</p> <p>6 MR. BARRAS: Objection.</p> <p>7 THE WITNESS: Correct.</p> <p>8 BY MS. BURKE:</p> <p>9 Q. And no absences, right?</p> <p>10 MR. BARRAS: Objection.</p> <p>11 THE WITNESS: Correct.</p> <p>12 BY MS. BURKE:</p> <p>13 Q. How, if at all, did absences impact</p> <p>14 your engineers' ability with respect to the</p> <p>15 workload?</p> <p>16 A. I don't understand the question.</p> <p>17 Q. If they were absent, how, if at all,</p> <p>18 would that impact their ability to maintain the</p> <p>19 workload?</p> <p>20 A. It would cause a problem. If they're</p> <p>21 not there, they can't do the job.</p> <p>22 Q. Did you have any of the employees out</p> <p>23 on any kind of medical leave at all during</p> <p>24 2014?</p>

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<p>1 A. Not that I'm aware of.</p> <p>2 Q. What about during 2013?</p> <p>3 A. Not that I'm aware of.</p> <p>4 Q. If you have an employee out for</p> <p>5 extended leave of absence, do you take that</p> <p>6 into consideration in completing their</p> <p>7 performance area?</p> <p>8 A. No.</p> <p>9 Q. Are you aware of an area that directs</p> <p>10 you to do that if it's for a particular period</p> <p>11 of time?</p> <p>12 A. No.</p> <p>13 Q. Do you still have Gross-10 in front</p> <p>14 of you?</p> <p>15 A. I do.</p> <p>16 Q. The second to last page is Page 1023.</p> <p>17 Do you see that?</p> <p>18 A. I do.</p> <p>19 Q. There's an area for leading,</p> <p>20 performing, developing, new. Do you see that?</p> <p>21 A. I do.</p> <p>22 Q. And there's certain bullet points.</p> <p>23 Let's go to the last page.</p> <p>24 A. (Witness complies with request.)</p>	<p>1 marked for identification.)</p> <p>2 * * *</p> <p>3 BY MS. BURKE:</p> <p>4 Q. This is Gross-11. This is Rennie's</p> <p>5 2014 year end performance review. First of</p> <p>6 all, do you recognize this review as something</p> <p>7 you completed? His 2014 is also attached as</p> <p>8 well. If you go to Page 986, it might make it</p> <p>9 a little easier to identify if that's your</p> <p>10 electronic signature or not.</p> <p>11 A. So 986 pertains to the 2013</p> <p>12 performance year end.</p> <p>13 Q. Which was issued in early 2014?</p> <p>14 A. Correct.</p> <p>15 Q. So if you go to Page 985, you give</p> <p>16 some constructive criticism or feedback to Mr.</p> <p>17 Rennie here, right?</p> <p>18 MR. BARRAS: Objection. You can</p> <p>19 answer.</p> <p>20 THE WITNESS: Yes.</p> <p>21 BY MS. BURKE:</p> <p>22 Q. We discussed this a moment ago but</p> <p>23 you did discuss the issuance of his prints?</p> <p>24 A. Yes.</p>
Page 66	Page 68
<p>1 Q. It says performing duties less than</p> <p>2 three months of the year due to an authorized</p> <p>3 absence or leave. Have you seen that before?</p> <p>4 MR. BARRAS: I don't see where</p> <p>5 you are.</p> <p>6 BY MS. BURKE:</p> <p>7 Q. Page 1024.</p> <p>8 MR. BARRAS: Thank you. What was</p> <p>9 the question?</p> <p>10 BY MS. BURKE:</p> <p>11 Q. Have you seen that before?</p> <p>12 A. I did.</p> <p>13 Q. Did you criticize Jim Rennie about</p> <p>14 making sure he gets his prints out on time and</p> <p>15 if customers have to wait, they'll move on and</p> <p>16 you could lose the sale?</p> <p>17 A. I probably had that discussion with</p> <p>18 him.</p> <p>19 Q. Did you also have concerns about his</p> <p>20 schedule and working remotely and whether or</p> <p>21 not you knew what his whereabouts were?</p> <p>22 A. No.</p> <p>23 * * *</p> <p>24 (Whereupon, Exhibit Gross-11 was</p>	<p>1 Q. You were hoping he would get them out</p> <p>2 the day before they're due?</p> <p>3 A. Yes.</p> <p>4 Q. You say the other thing I would like</p> <p>5 to see improved for Jim is his schedule for the</p> <p>6 week. I should know where he is at when</p> <p>7 working remotely and sometimes I find it</p> <p>8 difficult to reach him. Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. So because of that, you wanted and he</p> <p>11 agreed to keep you informed more regularly of</p> <p>12 what his schedule was, right?</p> <p>13 A. Yes.</p> <p>14 Q. Did you encourage any of your team</p> <p>15 members to proceed with any further education?</p> <p>16 A. I did.</p> <p>17 Q. For what reason?</p> <p>18 A. Knowledge is power.</p> <p>19 Q. Thought it was an asset, right?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Sorry, you have to say yes or no.</p> <p>22 A. Yes.</p> <p>23 Q. As an example, you had said that</p> <p>24 particularly to Mr. Stinson, right?</p>

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<p>1 A. Yes.</p> <p>2 Q. You emphasized that to your team as</p> <p>3 whole; he wasn't just singled out, right?</p> <p>4 A. Correct.</p> <p>5 Q. Have you told me everything you can</p> <p>6 recall about the discussion that you had with</p> <p>7 Ed Magee on that call about choice of</p> <p>8 alternatives between Suzette Walker and Ed</p> <p>9 Macintosh?</p> <p>10 A. I believe so.</p> <p>11 Q. Other than that conversation and once</p> <p>12 that concluded, did you have any additional</p> <p>13 conversations with anyone about the RIF?</p> <p>14 A. No.</p> <p>15 Q. No one on your team was impacted,</p> <p>16 right?</p> <p>17 A. Correct.</p> <p>18 MS. BURKE: Off the record.</p> <p>19 * * *</p> <p>20 (Whereupon, there was an</p> <p>21 off-the-record discussion.)</p> <p>22 * * *</p> <p>23 BY MS. BURKE:</p> <p>24 Q. Sir, I assume I know your answer but</p>	<p>1 BY MR. BARRAS:</p> <p>2 Q. Can you get Exhibit Gross-3 in front</p> <p>3 of you?</p> <p>4 A. Okay.</p> <p>5 Q. Page 1000.</p> <p>6 A. Okay.</p> <p>7 Q. The manager performance summary.</p> <p>8 A. Yes.</p> <p>9 Q. The last sentence, concentrate on all</p> <p>10 high bandwidth orders. Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. Why did you tell Mr. Stinson he</p> <p>13 should focus on all high bandwidth orders?</p> <p>14 A. Because at that time that was the</p> <p>15 number one priority.</p> <p>16 Q. What was the number one priority?</p> <p>17 A. High bandwidth service orders and</p> <p>18 interval reduction.</p> <p>19 Q. Did you tell all of your team members</p> <p>20 that the priority was high bandwidth orders and</p> <p>21 service reductions?</p> <p>22 A. I believe so.</p> <p>23 Q. When you say at that time, does that</p> <p>24 include 2013?</p>
Page 70	Page 72
<p>1 while you're here, I want to ask. I'm going to</p> <p>2 give you a document that's previously been</p> <p>3 marked in other depositions in this case during</p> <p>4 Mr. Magee's. It was marked Verizon-14. I just</p> <p>5 want you to look at the first page of this</p> <p>6 screen shot of a computer entry, which were</p> <p>7 filled out in connection with some of the RIFs</p> <p>8 done for Verizon. Are you even familiar with</p> <p>9 that or did you go into the system and input</p> <p>10 any of that information?</p> <p>11 A. I don't believe I've ever seen this</p> <p>12 document before.</p> <p>13 MS. BURKE: Sir, I don't have any</p> <p>14 further questions for you. Your</p> <p>15 counsel may have follow-up and he may</p> <p>16 not.</p> <p>17 MR. BARRAS: I do, but let's take</p> <p>18 five minutes.</p> <p>19 * * *</p> <p>20 (Whereupon, a brief recess was</p> <p>21 held at this time.)</p> <p>22 * * *</p> <p>23 EXAMINATION</p> <p>24 * * *</p>	<p>1 MS. BURKE: I just want to be</p> <p>2 clear, you said high bandwidth and</p> <p>3 service reductions. He said interval</p> <p>4 reductions.</p> <p>5 MR. BARRAS: I'm sorry, I</p> <p>6 misspoke.</p> <p>7 BY MR. BARRAS:</p> <p>8 Q. Is it proper to say interval</p> <p>9 reductions?</p> <p>10 A. As part of the high bandwidth orders,</p> <p>11 yes.</p> <p>12 Q. So interval reductions are part of</p> <p>13 the high bandwidth orders?</p> <p>14 A. Correct, that's facility verification</p> <p>15 piece.</p> <p>16 Q. Why was high bandwidth a high</p> <p>17 priority?</p> <p>18 A. Leadership focused on it.</p> <p>19 Q. Okay. In your performance</p> <p>20 evaluations, and we can take Gross-3 as an</p> <p>21 example, on the last page, it looks like there</p> <p>22 are four ways of rating employees; is that</p> <p>23 correct?</p> <p>24 A. That is correct.</p>

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<p style="text-align: right;">Page 73</p> <p>1 Q. Leading, performing, developing and 2 new, leading is the highest an employee can 3 achieve? 4 A. Yes. 5 Q. And developing is the worse someone 6 can achieve? 7 A. Yes. 8 Q. In 2013, did any of your employees 9 that you rated receive a developing? 10 A. No. 11 Q. In 2014 did any of your employees 12 receive a developing rating? 13 A. No. 14 Q. When you say 2014, I mean work 15 performed in 2014 and rated in 2015? 16 A. No. 17 Q. Same answer for 2015? 18 A. Yes. 19 Q. So no employees received a developing 20 in 2015? 21 A. Correct. 22 MR. BARRAS: That's it. 23 MS. BURKE: We're good to go, 24 sir.</p>	<p style="text-align: right;">Page 75</p> <p>1 * * * 2 C E R T I F I C A T I O N 3 * * * 4 I, Hope Agosto, Professional Court 5 Reporter and Notary Public for the Commonwealth 6 of Pennsylvania, do hereby certify the 7 foregoing to be a true and accurate transcript 8 of my original stenographic notes taken at the 9 time and place hereinbefore set forth. 10 11 12 13 _____ 14 Hope Agosto 15 Court Reporter 16 Notary Public 17 18 19 20 (The foregoing certification of this 21 transcript does not apply to any reproduction 22 of the same by any means, unless under direct 23 control and/or supervision of the certifying 24 reporter.)</p>
<p style="text-align: right;">Page 74</p> <p>1 * * * 2 (Witness excused.) 3 * * * 4 (Deposition concluded at 5 11:43 a.m.) 6 * * * 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>	

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Exhibit H

Year-End Performance Assessment

2009 Performance Year



Employee Name (Last, First, MI) WALKER, SUZETTE, E	Job Title/Band/Organization SUPV-NETWORK ENGINEERING/7G
Appraisal Period	Start Date in Current Assignment 00/0000
Start Date in Current Job Title or Equivalent 00/0000	Start Date in Current Career Band or Equivalent 00/0000

InstructionsFor instructions on completing this form, refer to the **Employee's Guide to the Verizon Performance Management Plan**.**Section I – Results Achieved**

Record the results achieved by the employee for the most significant performance objectives with specific examples for each. The performance rating entered for this employee in the Compensation system will be displayed below. (Supervisors of VDSI employees should select the appropriate performance rating by placing an "X" in the appropriate box.) In evaluating the employee's overall performance contribution, supervisors should consider the extent to which the employee demonstrated integrity and the competencies that support Verizon's core values. Compliance with the Code of Business Conduct and all Verizon policies should be a key consideration in the decision process.

Note: Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved and demonstrated competencies.

Results Achieved Rating Scale:**L – Leading**

- Employee sustained performance above objectives, requirements and expectations.

P – Performing

- Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.

N – New

- Achievement relative to performance objectives cannot be evaluated due to short tenure in position.

D – Developing

- Employee met some but not all objectives, requirements and expectations, improvement needed.

Summary of Results Achieved:
☐ L ☒ P ☐ D ☐ N
Performance Objectives**Results Achieved**

Manage Employee Performance and Development
(Applicable to Supervisors Only):

Suzette provides her Associates with the training and support needed to complete functional and attain results.

Manage employee performance consistent with the *Verizon Performance Management Plan* and create a work environment that motivates employees to excel. This objective fulfills the following Strategic Imperative:

- Strengthen our culture

SOM Active Participation = Tracking
SOM Sold Participation = Tracking
SOM Revenue = \$335
Broadband NATB = 103,252
Fiber to the Cell Site = 111

This objective fulfills the following Strategic Imperative:

SOM Active Participation = 100%
SOM Sold Participation = 75%
SOM Revenue = \$410K
Broadband NATB = 91,581
Fiber to the Cell Site = 118

<ul style="list-style-type: none"> • Increase revenue 	
<p>Total Prefs passed Cum = 1,138,595 Total Prefs Open for Sale Cum = 945,873 Video Prefs Open for Sale Cum = 881,676 # WCs Video Network Ready = 18</p> <p>This objective fulfills the following Strategic Imperative:</p> <ul style="list-style-type: none"> • Take share from our competition 	<p>Total Prefs passed Cum = 1,139,760 Total Prefs Open for Sale Cum = 951,711 Video Prefs Open for Sale Cum = 906,054 # WCs Video Network Ready = 18</p>
<p>Core - E. PA- DE (\$M) = \$56.8 Core - Philadelphia (\$M) = \$10.3 FTTP- E. PA- DE (\$M) = \$168.9 FTTP - \$ Cost per Prem Passed = \$622 FTTP - \$ cost per MDU NC = \$837 FTTP - \$ Cost per MTU NC = \$1,246 Core - Expense - E.PA-DE (\$M) = \$10.7 Core - Expense - Philadelphia (\$K) = \$238 Retirements (\$M) = \$33.5</p> <p>This objective fulfills the following Strategic Imperative:</p> <ul style="list-style-type: none"> • Improve profitability 	<p>Core - E. PA- DE (\$M) = \$58 Core - Philadelphia (\$M) = \$10.9 FTTP- E. PA- DE (\$M) = \$165 FTTP - \$ Cost per Prem Passed = \$607 FTTP - \$ cost per MDU NC = \$779 FTTP - \$ Cost per MTU NC = \$1,121 Core - Expense - E.PA-DE (\$M) = \$12.4 Core - Expense - Philadelphia (\$K) = \$160 Retirements (\$M) = \$1.2</p>
<p>Reduce Old Work Tracking Increase ICGS Usage 40% Decrease Office Expenditures Tracking Increase Standardization Tracking Increase EWOs Drafted per Drafter 200 Orders per Drafter Increase EWOs Posted per Drafter 150 This objective fulfills the following Strategic Imperative:</p> <ul style="list-style-type: none"> • Increase productivity 	<p>Significant impact on "old" routines and estimates with posting operations. Lead efforts to recover materials resulting from office consolidation. Also rationed paper to all parties. Established processes that cross trained associates on daily functions. Improved return times on work orders, especially hi - caps. ICGS posting greatly improved in 2009.</p>
<p>DS1 CDDD = 92.2% DS3 CDDD = 89% OC-N CDDD = 81.8%</p>	<p>DS1 CDDD = 91.3% DS3 CDDD = 88.1% OC-N CDDD = 85.7% %DD1 < 20 Days = 95.5%</p>

%DD1 < 20 Days = 96.5%
 %DS3 < 20 Days = 85.6%
 %OC-N < 45 Days = 85.2%
 FTTP Total Held Orders = 6
 - Capacity Related held orders = 2
 - Installation turn-back orders = 4

This objective fulfills the following
 Strategic Imperative:

- Provide the best customer service

%DS3 < 20 Days = 90.6%
 %OC-N < 45 Days = 97%
 FTTP Total Held Orders = 5.1
 - Capacity Related held orders = 2.1
 - Installation turn-back orders = 3

Employment Development

- Performance Management (Quarterly & YE) Tracking
- Associate Reviews (Mid-Year & YE) Tracking
- Career Planning (Performance Agreement) January 30th
- Training Mandatory +2

Diversity Tracking
 Absence Associate
 <5.2%
 This objective fulfills the following
 Strategic Imperative:

- Create a culture of performance

Performance Management - Quarterly and Year End
 Completed On-Time
 Performance Agreement - Completed On-Time
 Training:

- Wats
- AMTS
- Asset Mgmt
- Peoplesoft
- CAAR APM 7
- Master Certificate for ROI Technology

Diversity Training: Bronze Degree
 Associate Absence: 6.64%
 Diversity Training - Bronze Degree
 100% Attendance

Overall summary of accomplishments:

- Implemented ICGS posting in Philadelphia (District wide resource)
- Successfully crossed trained team on 4824s, posting and issuing
- Directly resolved Held Orders
- Positive participation on committees - All Management Meeting and Employee Handbook creation
- Updated VBuild and Project Costing records
- Implemented new FTTP Inquiry process in Philadelphia
- Created Sell One More Bulletin Board
- Created Posting Transmittals Process
- Established a process to monitor "M" spending
- Continued to monitor absences
- Trained Engineers on the use of Aardwolf, Bulk Pr Recoveries and DSL Denials

Your leadership contributions through communication and driving our culture are:

- Gate keeper for Philadelphia Held Orders
- Continuous Learner - personal growth and career path education
- Lead resource for Philadelphia Office issues
- Distributed work to Re-engage Associates

Your opportunities for improvement are:

- Capital Budget
- Expense Budget
- DS0 CDDD
- Associate Absence Rate

Section II – Client Feedback – Optional

Summarize client feedback gathered throughout the year regarding the employee's performance, including demonstration of competencies that support Verizon's values. The input of clients may be solicited by the employee or provided voluntarily by clients to the employee or supervisor. Generally, the supervisor should discuss client input with the employee before it is considered in the assessment of performance.

Comments:

☐ **Preliminary Assessment:** Place an "x" in the box to the left to indicate that preliminary performance information has been recorded for reference in finalizing the Year-End Performance Assessment.

Note: This section should be completed only when the supervisor recording preliminary performance information is not the supervisor who will be completing and signing the final Year-End Performance Assessment for the employee.

Name of Supervisor Completing Preliminary Assessment:

Date:

Signatures

Your signature indicates that you have read and discussed this assessment with your supervisor and that you have been given the opportunity to record your comments on the form provided for this purpose.

Employee: SUZETTE WALKER

Date: 2/16/2010 9:51:34 AM

Appraising Supervisor: BRIAN MAGEE

Date: 1/29/2010 8:02:56 AM

Approving Manager: JOSEPH SNYDER

Date: 1/29/2010 8:29:28 AM

Performance Document - Year-End Performance Review

Suzette E Walker , SEC MGR-NTWK ENG
Year-End Performance Review: 01/01/2010 - 12/31/2010
Performance Year:2010 Business Group:Wireline
Band:7G

Summarize the results achieved by the employee for any objectives established throughout the year. In evaluating the employee's overall performance contribution, supervisors should consider the extent to which the employee demonstrated behaviors that support the organization's core values.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW FORM AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

1. Grow Revenues

Sell One More % Active Participation YTD - Tracking
Sell One More % Sold Participation YTD - Tracking
Sell One More \$ Sold Revenue YTD (000) - Tracking

- Due Date : 12/31/2010

- Status:

- Percent Complete: 0

- Performance Measures:Scorecard

- Imperatives:Increase Revenue

- Employee Accomplishments / Status:-\$515.88 Sell One More Sold Revenue

--

3. Increase Profitability

Manager Budget Core (\$M)

Manager Expense (\$M)

Late Supplements

- Due Date : 12/31/2010

- Status:

- Percent Complete: 0

- Performance Measures:Scorecard

- Imperatives:Improve Profitability

- Employee Accomplishments / Status:-Monitor "M" work to control expense dollars

-0 Late Supplements

4. Improve Productivity

Increase Standardization (meet milestones)

-E1, Provisioning, PSF, FE/VM, Contract Adm, PIng, PM

Decrease Office Expentitures by 20%

- Due Date : 12/31/2010

- Status:

- Percent Complete: 0

- Performance Measures:Scorecard

- Imperatives:Increase Productivity

- Employee Accomplishments / Status:-Monitor office expenses-supplies, postage, etc

-Institute scanning of all bills- no US mail or company mail delivery

-Redistribution of supplies/equipment to garages for in house use.

-Institute "sharing" of office supplies between various groups.

-Changed the Geo Tech process to an email process.

-Changed the PA One Call mail outs to achieve 48 hour delivery of prints.

5. Best Customer Experience

VPS

-LBW CDDD OTP @ 93.6%

-HBW CDDD OTP @ 92.7%

Hicaps Missed Report

- DS3 CDDD @ 8
- OC-N CDDD @ 2
- % Hi-cap Interval Reduction
- % LBW Complete in 9.96 Days
- % HBW Complete in 13.75 Days
- % RequestNet Response
- DS3 @ 98%
- OC-N @ 98%
- DS0 Held Orders (Daily Avg)
- OSP @ 8
- Total @ 130
- FTTP Total Held Orders (Daily Avg)
- Capacity Related Held Orders
- Installation Turn-back Orders
- Due Date : 12/31/2010
- Status:
- Percent Complete: 0
- Performance Measures:Scorecard
- Imperatives:Provide the Best Customer Service
- Employee Accomplishments / Status:-Provide drafting in support of DS1 CDDD
- Provide direction to ATs concerning service order and work order resolutions (In-house supervision)
- Resolve DSL issues, customer complaints and presidential complaints
- Resolve facility issues for new developments, businesses and residential customers
- Resolve FTTP address inquiries

6. Strengthen Our Culture

- Employee Development
- Performance Management (Qtrly & YE Appraisals)
- Associate Performance Management (Mid & YE Appraisals)
- Career Planning (Performance Agreements)
- Training
- Diversity
- Support Diversity Business Council and its Initiatives
- Associate Absence (%) - 5.2%
- Due Date : 12/31/2010
- Status:
- Percent Complete: 0
- Performance Measures:Scorecard
- Imperatives:Create a Culture of Performance
- Employee Accomplishments / Status:-Achieved Bronze Level Diversity Degree
- Train peers on Aardwolf, bulk pair recovery, Workbrain and dsl denial process
- Management Master Certificate for ROI Technology
- CAAR APM 7 Training

Section 2 - Manager Overall Assessment

Performance Summary (Required)

Suzette managed to juggle multiple projects and responsibilities in the first half of the year. The second half of the year was more challenging, due to both Assignment and Drafting retirements. Suzette adjusted to the changed environment and modified several process flows to focus on District-Wide Services. Regarding Assignment, Suzette continued to be a resource for DSL and general DS0 assignment issues. Regarding Drafting, Suzette supported a spike in Telco J design requests very well, which keep the work flowing from Engineering.

Section 3 - Feedback from others

Feedback from others (Optional)

Summarize client feedback gathered throughout the year regarding the employee's performance, including demonstration of competencies that support Verizon's values. The input of clients may be solicited by the employee or provided voluntarily by clients to the employee or supervisor. Generally, the supervisor should discuss client input with the employee before it is considered in the assessment of performance.

Section 4 - Employee Year-End Comments

Employee Year-End Comments
Comments:

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Performing

Signatures :

Employee : Suzette Walker

Date: 2011-02-11

Manager : Brian Magee

Date: 2011-02-11

Performance Document - Year-End Performance Review

Suzette E Walker , Sec Mgr-Ntwk Eng
Year-End Performance Review: 01/01/2011 - 12/31/2011
Performance Year:2011 Business Group:Wireline
Band:7V

Summarize the results achieved by the employee for any objectives established throughout the year. In evaluating the employee's overall performance contribution, supervisors should consider the extent to which the employee demonstrated behaviors that support the organization's core values.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW FORM AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Supervisor Responsibilities

1. Sets and communicates objectives, manages the work, directs the employee, and conducts a year - end formal review to assess the contribution to the business.
 2. Provides regular and ongoing performance feedback, training and development and takes appropriate action when employee does not meet performance standards.
- Due Date : 12/31/2011
 - Status:
 - Percent Complete: 0
 - Performance Measures:
 1. Employee receives a performance agreement/objectives, written year-end review and performance

discussion.

2. Places employee on performance improvement, recommends and administers discipline as appropriate

- **Imperatives:**Create a Culture of Performance

- **Employee Accomplishments / Status:**-Completed Associate performance agreements on time.

-Completed Associate Mid-Year Appraisals on time.

Manager Comments (Optional)

2. Leverage Best Network

Improve Network Reliability

- Meet CDD Objectives; LBW, HBW & OCN

- Meet HiCap Interval Reduction Initiatives - TBD

- Meet customer requirements through and always on, dependable, scalable network.

- Meet Objectives for Held Orders, DSL Requests, FAST Inquiries

- **Due Date :** 12/31/2011

- **Status:**

- **Percent Complete:** 0

- **Performance Measures:**Scorecard

- **Imperatives:**Take Share from our Competition

- **Employee Accomplishments / Status:**

-Extensive research for problems created by ICGS conversion process in PA-DE

-COPA Project

-DSL escalations

-Customer complaints due to service order process flow creating roadblocks. Coordinate with the APC and DRC to correct process flow issues and initiate additional training for associates.

-Loop qualification escalations

-Vbuild Committee to convert Aardwolf into vbuild for service orders

-Monitor held for cable service

orders in Aardwolf and vbuild for process flow

-Handle all DSL escalations for Philadelphia/Delaware

-Conduit drafting, posting and/or closings for Philadelphia

-Cable drafting and posting for Eastern North and Eastern South in respect to the needs of the business.

-Customer complaints due to service order process flow creating roadblocks.

-Coordinate with APC and DRC to correct process flow issues and initiate additional training

for associates and peers to provide cohesion to the process flow.

-Work on work order flow to and from contractors.

-ICGS Conversion assistance for Contractors

-FIOS assistance to technicians when needs of the business warrant.

-Maintain constant vigil on work orders requiring permits from City of Philadelphia due to high level of importance

Manager Comments (Optional)**3. Improve Productivity**

Increase Standardization (meet milestones)

-E1, Provisioning, PSF, FE/VM, Contract Adm, Plng, PM

Decrease Office Expenditures by 20%

- Due Date : 12/31/2011

- Status:

- Percent Complete: 0

- Performance Measures:Scorecard

- Imperatives:Increase Productivity

- Employee Accomplishments / Status:

-Asset Management corrections for Philadelphia/Delaware corporate books

- Monitor held for cable service orders in Aardwolf and vbuild for process flow

-Reorganization of office equipment and supplies during office clean up

-Recycle paper and plastic for Go Green Project.

-Recycle supplies between offices due to budget constraints such as: colored paper, folders, etc.

-vBuild Committee to convert Aardwolf into vbuild for service

orders

-Non-converted ICGS plans to create a software package for the purpose of designing work prints.

-Conduit drafting and posting in PA-DE.

-Drafting for non-ICGS area in Eastern North and Eastern South

•Approve contractor bills in Vision only when proper documentations are included.

•Monitor purchases with the utmost scrutiny due to cost constraints

•Create template for GPIS requirement of the rebuild/replacement of

manholes.

•Pole Management committee for creation of software application to track pole placements and removals.

•Non-converted ICGS plans to create a software package for the purpose of designing work prints scheduled to cutover 2012

•Extensive research for problems created by ICGS conversion process in PA/DE

•Drafting for non-ICGS area in Eastern North and Eastern South

•Loop qualifications escalations

•Mediate CPC issues for loop

qualifications

•Negotiated with Pitney Bowes to waive late fees (\$109.17)

Manager Comments (Optional)**4. Strengthen Our Culture**

Employee Development

- Performance Management (Qtrly & YE Appraisals)
- Career Planning (Performance Agreements)
- Training
- Diversity
- Support Diversity Business Council and its Initiatives

Associate Absence (%) - 5.2%

- Due Date : 12/31/2011
- Status:
- Percent Complete: 0
- Performance Measures:Scorecard
- Imperatives:Create a Culture of Performance
- Employee Accomplishments / Status:

- Training
- Domestic Violence
- Ensuring Network Reliability(Power of 1)
- PRS training
- Reducing Common IDDS troubles
- Preventable Outage Reduction-improving the Customer Experience
- Supervisor Responsibilities under the American with Disabilities Act
- Attendance Matters Training: "With All Due Respect: Actions to Build an Inclusive and Productive Work Environment"
- Accommodations to AT for superior customer service
- Convert associates to

Outlook

- Implement additional training for associates
- Meetings and classes: Adaptive Leadership, Credo/Best Assets, Emergency Management and AMTs training

Manager Comments (Optional) CONFIDENTIAL - INTERNAL USE ONLY (2/28/2016 4:28 PM)

Section 2 - Manager Overall Assessment

Manager's Previous Performance Summary

Mid-Year Review

Suzette continues to successfully lead her team and work functions. Between juggling work orders and service orders between Associates and Work Centers Suzette manages to keep the work flowing to the benefit of the Engineering Teams. Also with the advent of SOW Contractors Suzette as filled a role as

auditor of invoices.

Performance Summary (Required)

Suzette continued in the second half of the year to give 110% to her Assignment and Drafting Supervisory Responsibilities. Suzette exhibits a sense of ownership to her duties, which promotes efficiency and provides for creative solutions. The Assignment process flow changed in 2011 with the migration to VBuild, Suzette helped implement the move for our District. Suzette also continued to maximize the efficiencies between the

Drafting Teams within our District and the same on the Assignment side, but with the Western PA Team.

You demonstrated "living the Credo" by (Required):

Instructions: Provide examples of how Credo behaviors were demonstrated in reaching top objectives. For example, "Working with a cross functional team, reduced the customer fulfillment process by 15%, pulled together as a team, worked with a sense of urgency, and delivered a solution ahead of plan."

Suzette demonstrates the Credo by paying close attention to economical issues and is always willing to make the hard "go" - "no go" decisions. Examples are numerous, but DSL decisions in marginal areas and paper issues in the office are her shining examples.

Section 3 - Feedback from others

Feedback from others (Optional)

Summarize client feedback gathered throughout the year regarding the employee's performance, including demonstration of competencies that support Verizon's values. The input of clients may be solicited by the employee or provided voluntarily by clients to the employee or supervisor. Generally, the supervisor should discuss client input with the employee before it is considered in the assessment of performance.

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Section 4 - Employee Year-End Comments

Employee Year-End Comments
Comments:

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Performing

Signatures :

Employee : Suzette Walker Date: 2012-02-16

Manager : Brian Magee Date: 2012-02-16

Performance Document - Year-End Performance Review

Suzette E Walker , Spec Eng-Ntwk Engrg
Year-End Performance Review: 01/01/2012 - 12/31/2012
Performance Year:2012 Business Group:Wireline
Band:7T

Summarize the results achieved by the employee for any objectives established throughout the year. In evaluating the employee's overall performance contribution, supervisors should consider the extent to which the employee demonstrated behaviors that support the organization's core values.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW FORM AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Be More Profitable

Engineering Capital \$\$
Engineering Expense \$\$
Office Expenditures
Energy Reduction

- Due Date : 12/31/2012

- Status:

- Percent Complete: 0

- Performance Measures:Monthly Scorecard

- Employee Accomplishments / Status:

Suzette was instrumental in the following areas:

- Reorganization of office equipment and supplies
- Recycling of paper and plastic items
- Recycling of supplies between offices and departments
- Monitoring purchases with the utmost scrutiny.
- Monitoring service orders for process flow to avoid multiple unnecessary dispatches.
- Coordinating with APC and DRC to correct process flow issues to provide cohesion to the process flow
- Negotiating the transfer of Pitney Bowes postage machine from Philadelphia to Exton office
- Maintaining the integrity of the plats drive for access for various engineering groups – construction, contractors and vendors.
- Evaluating contractor design problems
- Coordinating no parking signs, bollard requests and advance of pavement documentation
- PA One Call contractor calls for locates, markups and dig ups
- Calls from Verizon technicians unable to access systems
- Providing prints for Verizon locates to duct watcher
- Responding to City of Philadelphia design request via email
- addressing assist tickets for associate computer issues.
- Handling building issue for 900 Race Street with Real Estate, Legal and Corporate Departments
- Processing of bills and vouchers for 900 Race Street
- Monitoring Transportation Operation open items, complaints or issues given to City of Philadelphia
- PA One Call complaints
- PA One Call designs
- Coordination of PC refresh issues and replacements

Manager Comments (Optional)**Improve the Customer Experience**

Prints Issued On Time
 Permits/ROW Request On Time
 DSO Held Orders
 DSL Held Orders
 Associate Metrics/Stats

- Due Date : 12/31/2012

- Status:

- Percent Complete: 0

- Performance Measures: Monthly Scorecard

- Employee Accomplishments / Status:

Suzette's contribution to the improvement of the Customer Experience included the following items:

- Resolution of customer complaints due to service order process flow creating roadblocks
- Correction of process flow issues and initiate additional training for associates
- Resolution of loop qualification escalation for PA/DE expediently
- Monitoring held for cable service orders on the Dexter report, in vbuid for process flow, and field turnbacks from Construction.
- Resolution of calls concerning DSL and DSO escalations for PA/DE immediately
- Maintaining constant vigilance on work orders requiring permits from City of Philadelphia due to a high

level of importance (lane closures, sidewalk closures, Fairmount Park and Penn dot permits)

-Monitoring work order issuing process for PA/DE

-Mediation of CPC issues requiring loop qualification updates prior to LAM

date

-Providing facility assistance for COPA project

-Providing facility assistance to technicians on FIOS orders when the needs of the business warrant.

-Auditing as-builts for conduit prints drawn by vendors and contractors services for accuracy.

Assignment technician results

ACD Calls 5,627

Vbuild service order resolved 1,660

Vbuild service orders completed 483

Manager Comments (Optional)

Simplify Products, Policies and Processes

Estimate Administration

-Close Outs

-Posting

Routine Administration

-Close Outs

-Posting

SOW Contractor Administration

GPIS Administration

- Due Date : 12/31/2012

- Status:

- Percent Complete: 0

- Performance Measures: Monthly Scorecard

- Employee Accomplishments / Status:

Suzette accomplished the following items to simplify products, policies and processes:

-Monitoring the drafting, posting and closing of conduit and cable work orders in PA/DE in various software applications

-Constantly monitor Asset Management for corrections required for Philadelphia/DE corporate books.

-Diminishing the backlog of old work orders both cable and conduit by cancelling or closing the work prints.

-Implementing

training program for associates to update and enhance skill sets for work order preparation and posting, loop makeups, 4824s, etc.

-Processing as-builts for conduit expeditiously to meet time constraints once all the pertinent documentation (redlines and billing) is received.

-Scanning redline copies into vbuild immediately upon receipt.

-Performing Sarbanes Oxley -3 way match for audit purposes.

Drafting results

Loop makeups -

362

Items drafted - 192

Items posted - 227

Items CC'd 76
 Items closed 122
 4824 items - > 100

Manager Comments (Optional)

Fuel Our Culture

Performance Agreements (Qtrly & YE Obj/Appraisals)
 Associate Performance Agreement (Mid & YE Obj/Appraisals)
 Absence Administration

- Due Date : 12/31/2012
- Status:
- Percent Complete: 0
- Performance Measures: Monthly Scorecard

- Employee Accomplishments / Status:

In order to fuel our culture, Suzette performed and attended the for events:

- Creating associate performance and objectives
- Creating associate mid-year appraisals.

Meetings attended

PA/DE Assignment Technician work status
 CAB Request Streamline Process
 IDDS Conduit Conversion
 First Family Practice of DE PUC complaint
 Kent County ASWC
 TPDS ADA Ramps Specifications for City of Philadelphia
 Anthem Better Health
 Wellness Clinic
 Make

My Day
 Improving Attendance Through work Relationships

Training

The ROI of Employee Engagement
 The Sandwich Generation
 Code of Conduit: Integrity in Action
 NSOP - Navigation, View and Search
 IDDS Non Converted Wire Center
 PRS Training
 EPM - Spreadsheet Training
 ADA Training
 Mid-Atlantic Medical Restriction Training

Manager Comments (Optional)**Section 2 - Manager Overall Assessment****Manager's Previous Performance Summary****Mid-Year Review**

Suzette has a small drafting team and 2 Assignment Technicians. Her team drafted approx 75 workorders and posted approx 45 workorders. Her AT's completed 71 Hi-Caps, 2489 misc assignments, 432 ewo assignments. Suzette works to organize, assemble and arrange resources to meet goals. Continues to seek and accept responsibilities.

Performance Summary (Required)

Suzette brings several years experience to the department and provides quality work. Suzette had a small drafting team and 2 Assignment Technicians. In her position, she not only works for her direct manager, but also all the other managers that she interacts with and supports. Suzette is a performer. Suzette worked extremely hard to ensure that the districts DS0 orders were processed and that the orders were flowing. Suzette has been reassigned to an engineer in the Philadelphia office.

You demonstrated "Living the Credo" by (Required):

Instructions: Provide examples of how Credo behaviors were demonstrated in reaching top objectives. For example, "Working with a cross functional team, reduced the customer fulfillment process by 15%, pulled together as a team, worked with a sense of urgency, and delivered a solution ahead of plan."

Suzette works to ensure that customers receive their service in a timely fashion. She ensured that the DS0 orders were being worked.

Section 3 - Feedback from others**Feedback from others (Optional)**

Summarize client feedback gathered throughout the year regarding the employee's performance, including demonstration of competencies that support Verizon's values. The input of clients may be solicited by the employee or provided voluntarily by clients to the employee or supervisor. Generally, the supervisor should discuss client input with the employee before it is considered in the assessment of performance.

Section 4 - Employee Year-End Comments**Employee Year-End Comments**

Comments:

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>

Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Performing

Signatures :

Employee : Suzette Walker

Date: 2013-02-21

Manager : Patricia McCoach

Date: 2013-02-21

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VZ/WALKER 845

Exhibit I

2013 Performance

2013 - Year-End Performance Review

Employee: Suzette E Walker , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group:Wireline
Band:7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

<p>- Description and Measures:Model the Credo in our daily work including by demonstrating Integrity, customer focus, sense of urgency, personal accountability, and teamwork, and by complying with the Business Code of Conduct.</p> <p>- Employee Accomplishments / Status:</p>
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- Resolve customer complaints due to service order process flow creating roadblocks when assistance requested.
- Maintain the integrity of the plats drive for access for various engineering group – constructions, contractors, vendors, utilities, etc.
- Evaluate contractor design problems
- Coordinate no parking signs, bollard requests and advance of pavement documentation.
- Calls from Verizon technicians with facilities issues in need of engineering assistance.
- Handle building issues for 900 Race Street with Real Estate, Legal and Corporate Departments
- PA One Call complaints and designs
- Maintain constant vigilance on work orders requiring permits for the City of Philadelphia due to a high level of importance (lane closures, sidewalk closures, Fairmount Park and PennDOT permits)
- Diminish the backlog of old work orders both cable and conduit by researching their status and proceeding to resolve the problems.
- Monitor Transportation Operations open items, complaints and/or issues concerning Verizon facilities
- Provide duct watchers with prints for Verizon locates when necessary.
- Coordinate the movement of Verizon facilities on PennDOT Highway Jobs. (S0676, Richmond St., etc)
- Create CWO print for 3rd Party reimbursable work for CLECs
- Coordinate renovation for bridge reconstruction work.(Willow Grove Ave., 40th St., etc.)
- Maintain a professional relationship with the City of Philadelphia to resolve facilities complaints, problems and concerns within the Philadelphia area.
- Use all available training offered to enhance efficiency and the work process
- Provide updated on changes in timeline to better coordinate the completion of work in a timely manner.
- Maintain a professional demeanor when confronted with issues and attempting to resolve these issues internally and externally of the Verizon organization.
- Continue to ask questions concerning my new position. There is a need to absorb a great deal of terminology and processes that are required to become proficient in this job.

Manager Comments (Optional)

Additional Revenue Growth

- **Description and Measures:** Assist with network expansion and facility build targets.
- SFU Greenfields
- MDU/MTU Overlays
- MDU/MTU Greenfields

Support new products and global product expansion

- FTTCS

- Employee Accomplishments / Status:

- Monitor conduit work order status
- Resolve open 4824 items quickly and effectively for accuracy without redundancy
- Coordinate with APC and DRC to correct or expedite issues that are being held due to roadblocks.
- Provide facility assistance to technicians on FIOS orders when the needs of the business warrant
- Audit as-built for conduit prints drawn by vendors and contractors for problems
- Provide information on problems from

FIOS customers to the proper individuals to provide customer satisfaction.

Manager Comments (Optional)**Manager Comments (Optional)**

- **Description and Measures:** -Capital Budget
- Expense Budget
- Estimate Administration
- Routine Work Administration
- CWO Administration
- Aggressively control and reduce all operating and capital costs, meeting 2013 budget commitments.
- **Employee Accomplishments / Status:**
- Recycle paper and plastic items
- Recycle supplies between offices and departments
- Monitor purchases with the utmost scrutiny.
- Process bills and vouchers for 900 Race Street with speed and accuracy
- Monitor the cost effectiveness of doing a work order as opposed to a more cost effective resolution
- Provide assistance with new processes and procedures to create a smoother work flow for work orders and service orders.
- Provide
- engineers and marketing with information on new developments in the design stages
- Process reimbursable work prints with accuracy and efficiency to expedite payment.
- Evaluate all designs while paying close attention to cost and necessity.

Manager Comments (Optional)**Leverage Best Network and Improve Customer Service**

- **Description and Measures:** Leverage technology to deliver network and services reliability.
- Apply a customer - first - attitude to all transactions, products and services.
- Support HiCapp Prints Issued On Time - 95% Objective
- Stay current with GPIS Reviews
- Stay current with 3rd Party Applications
- Increase knowledge of conduit design
- **Employee Accomplishments / Status:**
- Diminish the backlog of old work orders both cable and conduit by cancelling or closing the work prints.
- PA One Call contractor calls for locates, markup and dig ups
- Direct design prints to the proper Engineers to expedite the completion of new developments in PA.
- Respond to City of Philadelphia design requests via email
- Respond to design requests for engineering firms and consultants via email
- GPIS jobs reviewed
- 186
- 3rd Party Applications - 20 CWO, 25 estimates
- Conduit Design request from engineering firms - 46
- Verizon work prints - 20

Manager Comments (Optional)

Employee Culture & Performance

- **Description and Measures:** Get the job done the right way.
Be accountable for results, adhere to our core values and operate with a sense of urgency.
Drive change and innovation that brings results to the bottom line.
Complete Training as required.
Submit Mid Year and Year End Accomplishments as required.

- **Employee Accomplishments / Status:** Attend training and meetings to enhance abilities.

vLicense Training
PRS Training
PAR Module Training
Antitrust Competition Law
How to Avoid Becoming a Distracted Driver
Building Shareholder Value
Keys for Safeguarding Privacy and Confidential Information
Requestnet
vLicense Conduit
CCP Training
vBuild - ISp and OSP
DC WEB Training
ESSM Requestnet Training
vImpact Training
CIAT Intergration

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

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Employee Comments (Optional):

◆ Manager Signature & Release to Employee	Date: 02/21/2013
◆ Employee Signature	Date: 02/21/2013

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary:
<p>Suzette was moved to Conduit/Highway in the first half of the year due to existing knowledge of conduit and the City Permit process. GPS review has been a positive transition, but conduit design has been hard to transition. Suzette has missed time due to an injury, which has made the transition difficult. The conduit area is still setup for the former Conduit Engineer and I have received complaints about the conduit mailbox being full. We are not where the Conduit/Highway Team needs to be at this time.</p> <p>The Phila/DE Team has mixed results on the FOC Metric: Missing DS1 and OCN, Making DS3 and Ethernet. The Phila/DE Team is also missing the Capital Metric.</p>

Employee Comments (Optional):

◆ Manager Signature & Release to Employee	Date: 08/06/2013
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◆ Employee Signature

Date: 08/06/2013

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary
<p>PA-DE had a very successful results year in 2013. Capital, Expense, MDU/MTU, Prints Issued, Standard Interval Compliance were all positive. FOC Intervals were a negative for both the District and Sub-District Teams.</p> <p>Suzette made a transition at the end of 2012 to the Conduit Department from a Supervisory Role, she remained with Conduit all of 2013. In the new job, Suzette adapted to the "Conflict Management" function that was previously outsourced. The Core function, "Conduit Design" was not performed by Suzette to the level necessary to demonstrate ownership. This assignment was an opportunity for growth, but Suzette kept to a comfort zone and allowed the Contract Engineer to run the Conduit Department.</p>

Employee Comments (Optional)

◆ Manager Signature & Release to Employee

Date: 02/24/2014

◆ Employee Signature

Date: 02/24/2014

Section 5 - Performance Rating

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Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position. - New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee. - Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: **Developing**

Signatures :

Employee : Suzette Walker Date: 2014-02-24

Manager : Brian Magee Date: 2014-02-24

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Exhibit J

Metropolitan Life Insurance Company
MetLife Disability, P. O. Box 14590, Lexington, KY 40511
Phone: 1-800-636-4228 Fax: 1-800-230-8531

MetLife[®]

May 16, 2013

Suzette Walker
2748 N Judson Street
Philadelphia, PA 19132

RE: Employer: Verizon Communications
Absence Number: MB151RD13352
ID Number: 774196109

Dear Ms. Suzette Walker:

Why You Have Received This Letter:

On May 16, 2013, we received a Health Care Provider Certification (HCPC) or other information related to this leave request certifying your need for leave beginning April 26, 2013.

How Absences Related To This Leave Are Handled:

Based on this information your leave request has been approved from April 26, 2013 through June 9, 2013.

These absences are counted as leave under the Family Medical Leave Act (FMLA), state family medical leave laws and/or Verizon's family and medical leave program, as applicable.

Regardless of the amount of leave you request, you are only entitled to the amount of leave available under the applicable leave programs listed above.

Important Information You Should Know:

Verizon will not require you to substitute or use paid leave during your family and medical leave if leave is to care for a qualified family member. If you are approved for family and medical leave due to your own serious health condition and you are approved for Short-Term Disability benefits (STD), family and medical leave will run concurrently with approved STD pay.

You may be required to present an authorization to return to work prior to returning to work. If such authorization is required but not received, your return to work may be delayed until the authorization is provided. A list of the essential functions of your position is not attached. If attached, the fitness-for-duty certification must address your ability to perform these functions.

We May Need Additional Information:

If your need for leave extends beyond June 9, 2013, you may need to provide additional information to support the extension. Under certain circumstances, MetLife may also request a recertification of your need for leave. MetLife will contact you in writing if your need for leave requires recertification.

What To Do if You Have Questions:

If you believe there is a workplace arrangement or accommodation that will enable you to return to work and perform your job, please contact your supervisor or complete an Accommodation Request (Form 20-1927) which can be found on About You at the following link:

<http://myvzwel.verizon.com/formsportal/appmanager/verizon/forms>

If you have questions regarding your leave and would like to speak to a MetLife representative, please contact MetLife's Total Absence Management Service Center Monday through Friday from 8:00 A.M. to 11:00 P.M. Eastern Time at 1-800-636-4228 or consult www.metlife.com/mybenefits.

For efficient and prompt claim handling, all documents or correspondence returned to us should contain your claim number.

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Exhibit K

Metropolitan Life Insurance Company
MetLife Disability, P. O. Box 14590, Lexington, KY 40511
Phone: 1-800-638-4228 Fax: 1-800-230-8531

MetLife[®]

June 6, 2013

Suzette Walker
2748 N Judson Street
Philadelphia, PA 19132

RE: Employer: Verizon Communications
Absence Number: MB151RD13352
ID Number: 774196109

Dear Ms. Suzette Walker:

Why You Have Received This Letter:

On May 20, 2013, we received a Health Care Provider Certification (HCPC) or other information related to this leave request certifying your need for leave beginning April 28, 2013.

How Absences Related To This Leave Are Handled:

Based on this information your leave request has been approved from June 10, 2013 through July 14, 2013.

These absences are counted as leave under the Family Medical Leave Act (FMLA), state family medical leave laws and/or Verizon's family and medical leave program, as applicable.

Regardless of the amount of leave you request, you are only entitled to the amount of leave available under the applicable leave programs listed above.

Important Information You Should Know:

Verizon will not require you to substitute or use paid leave during your family and medical leave if leave is to care for a qualified family member. If you are approved for family and medical leave due to your own serious health condition and you are approved for Short-Term Disability benefits (STD), family and medical leave will run concurrently with approved STD pay.

You may be required to present an authorization to return to work prior to returning to work. If such authorization is required but not received, your return to work may be delayed until the authorization is provided. A list of the essential functions of your position is not attached. If attached, the fitness-for-duty certification must address your ability to perform these functions.

We May Need Additional Information:

If your need for leave extends beyond July 14, 2013, you may need to provide additional information to support the extension. Under certain circumstances, MetLife may also request a recertification of your need for leave. MetLife will contact you in writing if your need for leave requires recertification.

What To Do If You Have Questions:

If you believe there is a workplace arrangement or accommodation that will enable you to return to work and perform your job, please contact your supervisor or complete an Accommodation Request (Form 20-1927) which can be found on About You at the following link:

<http://myvzwab.verizon.com/formsportal/accomanager/verizon/forms>

If you have questions regarding your leave and would like to speak to a MetLife representative, please contact MetLife's Total Absence Management Service Center Monday through Friday from 8:00 A.M. to 11:00 P.M. Eastern Time at 1-800-638-4228 or consult www.metlife.com/mybenefits.

For efficient and prompt claim handling, all documents or correspondence returned to us should contain your claim number.

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VZ_WALKER_188

Exhibit L


Claim Number	Task Name	Task Status	Subject/Comments	Comment Date	Comment	Scheduled Date	Completed Date	Completed By
571304238497	DPA Converted Diary Memo	Complete	ABSENCE MGMT RECORD SENT C	07/16/2013 12:18 AM	TO: // APPEAL REC'D DT: // APPEAL REFERRAL DT: // APPL INTL 45 DAY END DT: // APPL EXT REQ DT: // APPL 45 DAY EXT END DT: // APPL DETERMINE DT: // APPEAL REFER TO CLAIMS DT: //	07/16/2013 12:18 AM	07/16/2013 12:18 AM	Batch, UDS / System
571304238497	Info Received - IVR Submission	Complete	EE reported Future Part Time RTW 07/15/2013	07/11/2013 11:25 AM	ABSENCE MGMT RECORD SENT C SSN: 204-52-2129 CLM: 571304238497 FEED DT: 07/16/2013 RPT: 310433 SUB: 1006 SUBPT: 0002 CLM TYP: STD TRX TYP: S TIMESTAMP: 2013-07-15-22:22:52.432080 EMP ID: 774196109 HIRE DT: 10/03/1978 CLM RPTD DT: 05/07/2013 FDA: 04/26/2013 STATUS: 02 CLM STAT RSN CD: 01 DENIAL RSN CD: WORK ST: PA DLW: 04/25/2013 RTW: // EST RTW: // RELATED CLAIMS TYPE RELATED CLAIMS TYPE (1) MB151RD13352 TAM (2) (3) (4) (5) (6)	07/11/2013 11:25 AM	07/16/2013 03:38 PM	Astorga, Kimberly M / STD Clms Spec
571304238497	Info Received - IVR Submission	Complete	ER CONFIRMED EE RTW ON MONDAY 07/15/2013 WORKING	07/16/2013 03:38 PM	FIVE HOURS PER DAY SPOKE WITH BRIAN	07/11/2013 11:25 AM	07/16/2013 03:38 PM	Astorga, Kimberly M / STD Clms Spec
571304238497	Subsequent Claim Decision	User Terminated	F/U FOR MEDICAL	06/06/2013 11:21 AM		07/11/2013 11:21 AM	07/16/2013 03:39 PM	Astorga, Kimberly M /

Exhibit M

Sep. 10. 2013 9:44AM

130910F06957

No. 5354 P. 1

 01# 571304238497
F800-230-9531 1118 W. Baltimore Pike
Health Ctr, 3rd Floor
Media, PA 19063
800-321-9999
ROTHMAN
INSTITUTE

CHARLES L. GETZ, M.D.

For Suzette Walker Date 9/10/13

Rx Ms Walker will begin working
5hr/day on 10/1/13, 6hr/day on
11/1/13, 8hr/day on 12/1/13.

Renewal 1 2 3

MD 072654-L

BG 706532D

NPI 1069440627

Substitution Permissible

In order for a brand name product to be substituted, the
prescriber must handwritten "brand necessary" or
"brand medically necessary" in the space below.

If Rothman Logo is not visible in the background this Prescription is NOT VALID.

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VZ_WALKER_240

Exhibit N

Claim Number	Task Name	Task Status	Subject/Comments	Comment Date	Comment	Scheduled Date	Completed Date	Completed By
57130423849	Claim Comment (M)	Complete				09/18/2013 09:34 AM	09/18/2013 09:34 AM	Astorga, Kimberly M / STD Clms Spec
57130423849	Claim Comment (M)	Complete	CLAIM REVIEW	09/18/2013 09:34 AM		09/18/2013 09:34 AM	09/18/2013 09:34 AM	Astorga, Kimberly M / STD Clms Spec
57130423849	Incoming Call (M)	Complete				09/18/2013 09:37 AM	09/18/2013 09:39 AM	Astorga, Kimberly M / STD Clms Spec
57130423849	Incoming Call (M)	Complete	INCOMING CALL FROM EE- ASKED CS TO RETURN HER CALL	09/18/2013 09:39 AM		09/18/2013 09:37 AM	09/18/2013 09:39 AM	Astorga, Kimberly M / STD Clms Spec
57130423849	Outgoing Communication	Complete				09/18/2013 09:39 AM	09/18/2013 09:45 AM	Astorga, Kimberly M / STD Clms Spec
57130423849	Outgoing Communication	Complete	OUTGOING CALL TO EE- CS CALLED EE BACK	09/18/2013 09:45 AM	CS TOLD HER SHE TRIED CALLING HER YESTERDAY. EE STATED THAT HER SUPERVISOR TOLD HER THAT SHE NEEDED TO RETURN FULL/TIME FULL DUTY ON 10/07/2013. ER ONLY ALLOWS 12 WEEKS OF REDUCED HOURS. EE UNDERSTOOD AND NEEDS TO SPECK WITH HER DR AND HAVE HER DR SEND OVER UPDATED MEDICAL. EE TOLD CS THAT THE	09/18/2013 09:39 AM	09/18/2013 09:45 AM	Astorga, Kimberly M / STD Clms Spec

Exhibit O

Manager Comments (Optional)**Simplify Products, Policies, and Processes**

- **Description and Measures:** Get the job done the right way.
Be accountable for results, adhere to our core values and operate with a sense of urgency.
Incorporate a CWS experiment.
Drive change and innovation that brings results to the bottom line.
100% Implementation of (IOF) EPM
Achieve WIG Objective
Implement 4 DX Initiative
Reduce CIP %
Reduce work order variance %
- **Employee Accomplishments / Status:** participates in weekly WIG huddles, providing results and knows objective of achieving reductions in facility verifications.

Manager Comments (Optional)**Fuel our culture**

- **Description and Measures:** Employee Development - job related training-complete minimum (2) training sessions
 - Complete (2) training courses
- Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents
Absence (%)
 - % Management Absence
 - Individual Absence Ratio <1%
- Recognition
- **Employee Accomplishments / Status:** In 2014 I had zero motor vehicle accidents and zero medical absence. I completed my training as needed.

Manager Comments (Optional)**District Objectives**

- **Description and Measures:** Meet all Chapter 30 requirements
Chapter 30 - Budget
C30 - BFRR - Regulatory On-Time
C30 - 2014 Regulatory Target
- **Employee Accomplishments / Status:** ongoing.

Manager Comments (Optional)

Simplify Products, Policies, and Processes
<p>- Description and Measures:Get the job done the right way. Be accountable for results, adhere to our core values and operate with a sense of urgency. Incorporate a CWS experiment. Drive change and innovation that brings results to the bottom line. 100% Implementation of (IOF) EPM Achieve WIG Objective Implement 4 DX initiative Reduce CIP % Reduce work order variance %</p> <p>- Employee Accomplishments / Status:Continued High Level Focus on SR's to reduce interval and Increase availability of products and services.</p>
Manager Comments (Optional)

Fuel our culture
<p>- Description and Measures:Employee Development - job related training-complete minimum (2) training sessions • Complete (2) training courses Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents Absence (%) • % Management Absence • Individual Absence Ratio <1% Recognition</p> <p>- Employee Accomplishments / Status:100% attendance in 2014 0 days absent</p>
Manager Comments (Optional)

District Objectives
<p>- Description and Measures:Meet all Chapter 30 requirements Chapter 30 - Budget C30 -BFRR - Regulatory On-Time C30 - 2014 Regulatory Target</p>

Incorporate a CWS experiment.
 Drive change and innovation that brings results to the bottom line.
 100% Implementation of (IOF) EPM
 Achieve WIG Objective
 Implement 4 DX initiative
 Reduce CIP %
 Reduce work order variance %

- Employee Accomplishments / Status: See attached PDF file for results.
 Successfully achieved all WIG objects agreed to on our weekly calls. For example, shorted all internals on SRs, Issue EWOs within 8 days of provisioning SRs, Meet with customers on all preset site survey. Provisioning test and turn up SRs without EWOs when equipment is available.

Manager Comments (Optional)

Fuel our culture

- Description and Measures: Employee Development - job related training-complete minimum (2) training sessions

• Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

• % Management Absence

• Individual Absence Ratio <1%

Recognition

- Employee Accomplishments / Status: See attached PDF file for results.
 Attended 14 training courses this year, no motor Vehicle accidents, and no absences.

Manager Comments (Optional)

District Objectives

- Description and Measures: Meet all Chapter 30 requirements

Chapter 30 - Budget

C30 - BFRR - Regulatory On-Time

C30 - 2014 Regulatory Target

- Employee Accomplishments / Status: See attached PDF file for results.
 Met all district objectives.

Manager Comments (Optional)

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status:*CREATED PROCESS FLOW FOR DS0 HELD ORDER IN VBUILD.
 *CREATED HBW PROCESS FLOW FOR NEW EMPLOYEE.
 *CWS COMPLIANT.
 *PARTICIPATED IN 4 DX INITIATIVES BRAINSTORMING SESSIONS.
 *COACHED PEERS IN MY DEPARTMENT AS WELL AS OTHER DEPARTMENTS WITH OUTSIDE PLANT, LFACS, TIRKS, AND ICGS KNOWLEDGE.

Manager Comments (Optional)

Fuel our Culture

- Description and Measures:Employee Development - job related training-complete minimum (2) training sessions

- Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

- % Management Absence
- Individual Absence Ratio <1%

Recognition

- Employee Accomplishments / Status:*COMPLETED ALL REQUIRED TRAINING WHICH INCLUDE DRIVER SAFETY SERIES: SHARING THE ROAD, DRIVER SAFETY SERIES: DO NOT BE A TAILGATER, DRIVER SAFETY SERIES: SAFE INTERSECTION TECHNIQUES, & 2014 ANTITRUST LAW
 *ESSM TRAINING
 *CNE TRAINING
 *REQUESTNET TRAINING
 *FUJITSU TRAINING
 *COMPLETED ALL REQUIRED TRAINING IN 2014.
 *COMPLETED MID YEAR REVIEW AS REQUIRED.
 *COMPLETED END OF YEAR REVIEW AS REQUIRED.
 *0 ABSENCES, 100 % PERFECT ATTENDENCE

Manager Comments (Optional)

Exhibit P

Delaware Engineering Organization List

1/1/2014					
Responsibility	Engineer	E-Mail	Office	Cell	Out of hrs
Manager	Brian Magee	REDACTED	REDACTED	REDACTED	REDACTED
ROW / 3rd Party	Dee Reinholm	REDACTED	REDACTED	REDACTED	REDACTED
Talleyville Holly Oak	Ernie Padovani	REDACTED			
Wilmington Penn Rose Marshallton New Castle	Mary Curtin	REDACTED	REDACTED	REDACTED	REDACTED
Hockessin Newark	Carl Bowman	REDACTED	REDACTED	REDACTED	
Wrangle Hill Middletown	Scott Panichelli	REDACTED	REDACTED	REDACTED	REDACTED
Smyrna Dover Camden	John Shubrook	REDACTED	REDACTED	REDACTED	
Greenwood Hartly Felton Fredrica Georgetown Harrington Milton Milford Millsboro Seaford	Sam Reinhardt	REDACTED	REDACTED		
DE Highway Angola Bridgeville Dagsboro Delmar Gumboro Laurel Lewes Ocean View Rehoboth Selbyville	George Zang	REDACTED	REDACTED	REDACTED	

Main Line/Philadelphia Engineering Organization List

7/7/2014				
Responsibility	Engineer	E-Mail	Office	Cell
Manager	Brian Magee	REDACTED	REDACTED	REDACTED
Conduit/Highway	Anthony Portolese	REDACTED	REDACTED	REDACTED
Conduit/Highway	Gerry Slattery	REDACTED	REDACTED	REDACTED
Paoli Wayne Bryn Mawr	Paul Klauss	REDACTED	REDACTED	REDACTED
Ardmore Bala Cynwyd Kirklyn Larchmont Lansdowne Springfield Glenolden	Joe Scelsa	REDACTED	REDACTED	REDACTED
Market Regent	Maria Cesare	REDACTED	REDACTED	REDACTED
Jefferson Mayfair Pilgrim Orchard Knights Rd	David Perry	REDACTED	REDACTED	REDACTED
Dewey Eastwick Saratoga	Steve Murphy	REDACTED	REDACTED	REDACTED
Evergreen Sherwood Trinity	Joe Hui	REDACTED	REDACTED	REDACTED
Locust Pennypacker	Tom Hodge	REDACTED	REDACTED	REDACTED
Baldwin Chestnut Hill Davenport Germantown Ivy Ridge Poplar Waverly	Suzette Walker	REDACTED	REDACTED	REDACTED

Exhibit Q

Dave does an outstanding job at managing his workload. He pays strict attention to all Service Requests that come in via requestnet, doing what is necessary to deliver our products on time and within budgets. Dave also shares splitter add responsibility with his team mate Chiraq in getting orders released within a week of handoff, and ensures splitters are delivered on time to construction to allow their 14 day interval

to be met. Dave embraces the new 360 degree engineering that we now do and likes the responsibilities that come with it. Dave is an extremely talented engineer and likes to do things the right way. I have had several discussions with Dave on the possibility of continuing his education as well as balancing his commitments at home, and at some point in the future, take a college level course that makes sense with his career, as well as something he may like.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/07/2013

☒ Employee Signature

Date: 08/08/2013

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Dave has a very busy workload and works extremely hard to keep it under control. He feels frustrated sometimes as he believes he is not giving our customers his best performance, but I remind him that workloads prevent that. He knows our priorities and that is what I keep reinforcing with him. Concentrate on all high bandwidth orders and that everything else will fall in place.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/17/2014

☒ Employee Signature

Date: 02/17/2014

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position. - New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee. - Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Performing

Signatures :

Employee : David Stinson

Date: 2014-02-17

Manager : Carl Gross

Date: 2014-02-17

Exhibit R

2014 Performance

2014 - Year-End Performance Review

Employee: Suzette E Walker , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group:Wireline
Band:7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- **Description and Measures:** Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.
- **Employee Accomplishments / Status:**

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- Resolve customer complaints due to service order process flow creating roadblocks when assistance requested.
- Assist various departments with storm damage, problems and issues with outside facilities when needed.
- Maintain the integrity of the plats drive for access for various engineering groups - construction, contractors, vendors, utilities, etc.
- Evaluate engineering design problems for copper and fiber cables
- Resolve calls from Verizon technicians with facility issues in need of clarification on work orders an, service orders, damage claims, etc.
- Handle building issues for 900 Race Street with Real Estate, Legal and Corporate Departments when they arise.
- Answer PA One Call complaints when requested
- Maintain constant vigilance on work orders for TLS and ON orders.
- Provide ductwatchers with prints for Verizon facilities when necessary
- Coordinated the renovation for bridge reconstruction work at Willow Grove Ave.
- Continue to maintain a professional relationship with City of Philadelphia to resolve facility issues, complaints, problems and concerns within the Philadelphia area.
- Use all available training offered to enhance efficiency and the work process.
- Provide updates on changes in timeline to better coordinate the completion of work in a timely manner.
- Maintain a professional demeanor when confronted with issues and attempt to resolve these issues internally and externally of the Verizon organization.
- Continue to ask questions concerning my new position. There is a need to absorb a great deal of terminology and processes that are required to become proficient in this job.
- Perform early site surveys efficiently for speedy processing of firm orders.
- Incorporate new processes for Requestnet to maintain effectiveness.
- Adjust to the FTTP work flow process between departments to meet the HHs passed expectations.
- Apply for lane closure permits on arterial streets prior to the start of work.
- Resolve FTTP based problems using the proper processes to alleviate missing HHs.
- Increase interactions with leaders in other departments to demonstrate my ability to resolve problems.
- Visit customers to better align resources and achieve cost effective results.
- Seek coaching to improve my ability to achieve the best resolutions.

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prens Passed Incr

Total Prens Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status:

- Monitor work order status - FTTP, HBW, cell sites, etc.
- Resolve open 4824 items quickly and effectively for accuracy without redundancy
- Coordinate with APC, DRC, ATs, FIOS coordinators, etc. to correct or expedite issues that are being held due to roadblocks.
- Manage PARs for vendors to survey, design and draft facilities for cell sites, SRs and building demolitions
- Provide facility assistance to technicians of FIOS orders
- when the needs of the business warrant
- Provide information on problems from FIOS customers to the proper individuals to provide customer satisfaction.
- Take an active role to improve the alignment of resources in work processes.
- Participate in the Septa Dark Fiber Project
- Participate in the City of Philadelphia Project

Manager Comments (Optional)

Business Profile

- Description and Measures:

- Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.
- Consolidate systems, operations and facilities.
- Increase productivity by simplifying, standardizing and automating processes.
- Drive network convergence to improve capex and opex efficiency.
- Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status:

- Proper use of budget codes during the design of jobs as well as creating jobs within budget constraints.
- Recycle office supplies within the organization
- Monitor purchases with the utmost scrutiny
- Process bills, invoices and PARS with speed and accuracy.
- Monitor the cost effectiveness of doing a work order as opposed to a more cost effective resolution.
- Provide assistance with new processes and procedures to create a smoother work flow for work orders and service orders.
- Provide engineers and marketing with information on new developments in design stages.
- Process reimbursable work prints with accuracy and efficiency to expedite payment.

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-Evaluate all designs while paying close attention to cost and necessity.

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time,ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval - Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- **Employee Accomplishments / Status:-**PA One Call contractor calls for locales, markups and dig ups

-Direct deign prints to the proper engineers to expedite the completion of new developments in PA.

-Respond to design requests

-Processed:

>164 Invoices

>308 PARs

>10 designs from Contractors

31 GPIS requests

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30 3rd Party request
 > 15 PA One Call requests with conduit prints
 > 60 service order problems
 4 Penndot milling jobs
 > 1163 pole jobs, SRs, surveys, deck jobs, FTTCs, splitter add, Inquiries, 4824s ,etc.

Manager Comments (Optional)

Impact/Products/Policy and Processes

- Description and Measures: Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX Initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status:

-Provide assistance with new processes and procedures to create a smoother work flow for work orders and service orders.

-Provide engineers and marketing with information on new developments in design stages.

-Process reimbursable work prints with accuracy and efficiency to expedite payment.

-Evaluate all designs while paying close attention to cost and necessity.

-Monitor the cost effectiveness of doing a work order as opposed to

a more cost effective resolution.

-Provide information on problems from FIOS customers to the proper individuals to provide customer satisfaction.

-Process TLS and VON orders within the 8 day constraints.

Manager Comments (Optional)

Future Comments

- Description and Measures: Employee Development - job related training-complete minimum (2) training sessions

<ul style="list-style-type: none"> • Complete (2) training courses <p>Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents</p> <p>Absence (%)</p> <ul style="list-style-type: none"> • % Management Absence • Individual Absence Ratio <1% <p>Recognition</p> <ul style="list-style-type: none"> • Employee Accomplishments / Status:ESSM for Session <p>ESSM for OSP Driver Safety Series:Do Not Be a Tailgator GPON Augment ESSM Functionality SR Q Coded Antitrust Law Driver Safety Series Part 2 Driver Safety Changing Lanes Fujitsu Products Requestnet Updates Septa Project City of Philadelphia Project CPNI Training CLINET Training</p> <p>Manager Comments (Optional)</p>

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

<p>Manager Comments (Optional)</p>

<p>Employee Comments (Optional)</p>

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◆ Manager Signature & Release to Employee

Date: 02/25/2014

◆ Employee Signature

Date: 02/26/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary
District Averages vs Your Averages @ Mid Year: Prints Issued 136 vs 111 Hours Issued 6503 vs 3137 # ODN HH 97 vs 0 # NWC HH 223 vs 166 Average of Fac Verification 18.2 vs 10.3 SR Numbers 25 vs 6 Suzette your numbers look good considering your time in the Turf. Take ownership of your Turf and learn as much as you can during the remainder of this year on HBW. If you can get your Fac Verification under 8, you will be making a big contribution to the Team.

Employee Comments (Optional)

◆ Manager Signature & Release to Employee

Date: 08/14/2014

◆ Employee Signature

Date: 08/14/2014

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Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Your Average of Fac Verification 8.4 vs 12.7 Team's Average
 Your # of SRs 25 vs 57 Team's Average

Suzette continued to grow into the Turf role in 2014. She took the HBW focus and moved her facility verification number to metric. Suzette utilizes and manages the SOW Contractors well, but would benefit from completing more of the HBW surveys herself. Also greater focus on the end product of the Contractors' product is necessary.

Employee Comments (Optional)

◆ Manager Signature & Release to Employee

Date: 02/25/2015

◆ Employee Signature

Date: 02/25/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some</i>

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	<i>or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Performing

Signatures :

Employee : Suzette Walker Date: 2015-02-25

Manager : Brian Magee Date: 2015-02-25

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Exhibit S

2014 Performance

2014 - Year-End Performance Review

Employee: Carl E Bowman JR, Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status: I treat every customer, both external and internal, with the utmost respect and try to deliver a superior customer experience through my actions in resolving their issues to their satisfaction. I continue to act as a SPOC for the DelDOT online permitting system. I have set up training for my peers with DelDOT for the online system to go over changes to the process.

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: For 2014 I have issued 181 EWO's with the following breakdown:

35 Splitter Adds

6 SES over GPON Splitter Adds

62 Hicap orders (TLS, VON, DS1 over fiber, etc.)

29 FTTP jobs adding 372 more units to our network

13 CWO's

5 Equipment retirement jobs

10 Cellsite turn ups

15 Pole replacements

Manager Comments (Optional)**Be More Profitable****- Description and Measures:**

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status: To date I have issued 13 CWO's totaling \$268,456 with \$0 be written off. I have issued 5 retirement jobs, 2 for old SLC PG systems and 3 for a mutiplexer, that has helped to reduce our energy costs and also resulted in retirement dollars.

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time,ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval – Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- Employee Accomplishments / Status: To date I have issued 62 Hicap EWO's, all EWO's meeting the prints on time and Standard Interval metrics. For the 2nd half of 2014 I answered 41 SR's with an average of 3.02 days to answer them. I was the first in Delaware to utilize a new multiplexer, FW7120, to meet a customers needs for new service.

Manager Comments (Optional)**Simplify Products, Policies, and Processes**

- Description and Measures: Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status: I pride myself on issuing EWO's that do not require any changes from the field. Only a little over 22% of the my issued EWO's have needed 4824's and over half of those have been to reduce footages of placed cable. I am working on exceeding the 4DX goals that have been set for my area.

Manager Comments (Optional)**Fuel our Culture**

- Description and Measures: Employee Development - job related training-complete minimum (2) training sessions

• Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

• % Management Absence

- Individual Absence Ratio <1%

Recognition

• **Employee Accomplishments / Status:** I have exceeded the required number of training courses. I have had a perfect driving record since the start of my career at Verizon thanks to the continued use of the driver training courses.

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/26/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

CONFIDENTIAL

VZ_WALKER_306

Manager Performance Summary

District Averages vs Your Averages:

Prints Issued 136 vs 125

Hours Issued 6503 vs 5335

ODN HH 97 vs 147

NWC HH 223 vs 180

Average of Fac_Verification 18.2 vs 21.6

Average of SRs 25 vs 22

Carl, your results are fine, save the Facility Verification number. The target is 8 and you are on the wrong side of the Team's Average. There is not a more important target for you in the 2nd half of the year. We need to have more frequent communication on your daily held SRs.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/15/2014

☒ Employee Signature

Date: 08/15/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

CONFIDENTIAL

VZ_WALKER_307

Your Average of Fac_Verification 14.8 vs 12.7 Team Average

Your # of SRs 43 vs 57

Carl has made noticeable improvements in Customer contact. His knowledge of the SR process has also improved. He needs to continue to put effort into driving down the Facility Verification hours. It was a year of many changes and Carl was very supportive and engaged in the changes.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/23/2015

☒ Employee Signature

Date: 02/23/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating:**Performing**

Signatures :

Employee : Carl Bowman

Date: 2015-02-23

Manager : Brian Magee

Date: 2015-02-23

Exhibit T

2014 Performance

2014 - Year-End Performance Review

Employee: Ernest A Padovani , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status:

- A) Get job done right the first time.
- B) Get designs done in a timely manner
- C) Project manage work.
- D) Work with other engineers to solve engineering problems.
- E) Work with other engineers on designs.
- F) Work with construction, contract services on different projects.
- G) Work on more then one project at a time.
- H) Work with PennDot, municipalities, consultant and other utilities on different projects.
- I) Use adaptive engineering.
- J) Contact customers on SR's within 4 hours
- K) Site Survey SR's with 72 hours
- L) Answer SR's the same day as the survey.
- M) Issue work orders for SR's on time.

Manager Comments (Optional)**Grow Revenue****- Description and Measures:**

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: A) watch project and work order so they stay on time and budget
 B) Issued work orders early to so construction get have the work started early and finish early for possible early delivery of service
 EWOs Issued for De and Pa =303

Manager Comments (Optional)

Be More Profitable

- Description and Measures:

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status:

- A) Project manage work. Make sure work is issued and completed on time.
- B) Funnel major projects to Contract Services. Contract costs are lower then Core cost.
- C) Work with PennDot, Townships, County, developers, consultants and other utilities to minimize the affect on Verizon facilities.
- D) Get job done right the first time.
- E) In some cases have developer or customer place Verizon provided conduit.
- F) Sell One

More

- G) Work on more then one project at a time.
- H) Work with American U-Tel on bridge projects to keep cost down.
- I) Work with construction and contract services to keep cost down and have work done in timely manner and closed out.

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time,ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval – Overall

SR Response Interval - Ethernet

DS1
DS3
OC-N
Ethernet
Standard Interval Compliance
Prints Issued On Time
FAD Scheduled Date Met
LBW & HBW
ECCD On Time Performance
LBW & HBW
- Employee Accomplishments / Status: A) call customer within 4 hours after receiving the SR B) schedule site survey within 72 hours of receiving the SR C) answer the SR same day as survey D) use PA-De interval reduction
Manager Comments (Optional)

Simplify Products, Policies, and Processes
- Description and Measures: Get the job done the right way.
Be accountable for results, adhere to our core values and operate with a sense of urgency.
Incorporate a CWS experiment.
Drive change and innovation that brings results to the bottom line.
100% Implementation of (IOF) EPM
Achieve WIG Objective
Implement 4 DX initiative
Reduce CIP %
Reduce work order variance %
- Employee Accomplishments / Status:
Manager Comments (Optional)

Fuel our Culture
- Description and Measures: Employee Development - job related training-complete minimum (2) training sessions
• Complete (2) training courses
Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents
Absence (%)
• % Management Absence
• Individual Absence Ratio <1%
Recognition
- Employee Accomplishments / Status:
Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/26/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

District Averages vs Your Averages @ Mid Year:

Prints Issued 136 vs 171

Hours Issued 6503 vs 9262

ODN HH 97 vs 16

NWC HH 223 vs 23

Average of Fac_Verification 18.2 vs 25

Average of SRs 25 vs 33

Your numbers are solid except for Facility Verification. Our target is 8 and you are on the wrong side of our Team's Average. You have gained alot of experience on HBW in the first half of the year, you need

to put it into action and reduce this interval. We are going to have to set up more frequet conversation on your held SR.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/15/2014

☒ Employee Signature

Date: 08/15/2014

Section 4 - Year End Review

CONFIDENTIAL

VZ_WALKER_349

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Your Year End Average of Fac_Verification 16.5 vs 12.7

Your # of SRs 64 vs 57

Ernie needs to work on Customer communication; it is your responsibility to keep customers informed and to stay in contact. It is too easy in today's world to stay connected, this cannot be a fail point. Ernie also needs to get under his facility verification time, he should not be above the Team's average by 4 days. On the positive

Ernie's volume of SRs was solid. Also on the positive, his knowledgeable and wiliness to share his knowledge with the overall Team.

Employee Comments (Optional)
☒ Manager Signature & Release to Employee

Date: 02/23/2015

☒ Employee Signature

Date: 02/23/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to</i>

CONFIDENTIAL

VZ_WALKER_350

	<i>short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>
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Performance Rating:Performing

Signatures :

Employee : Ernest Padovani Date: 2015-02-23

Manager : Brian Magee Date: 2015-02-23

Exhibit U

2014 Performance

2014 - Year-End Performance Review

Employee: George W Zang , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status: Try to assist potential customers with orders and concerns as they arise.

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: Continue to issue FTTP greenfields(triple play) for SFUs. Sending Networks Extension Letters to all others, per company policy. No MDU issued year to date. Waiting on some FTTCs surveys, until cell sites are built. Always supporting new hi-cap customer prem equipment.

Manager Comments (Optional)

Be More Profitable

- Description and Measures:

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status: Try to minimize highway expenses by downsizing and/or eliminating

copper cables where appropriate. Will continue to evaluate whether force migration is a viable option. I am always looking to consolidate and simplify our facilities, particularly at the customer prem. I am always looking to retire unused equipment.

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time, ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval – Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- Employee Accomplishments / Status: I believe I have met all standard interval compliance as well as prints issued on time.

Manager Comments (Optional)

Simplify Products, Policies, and Processes

- **Description and Measures:**Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status:I believe I am always focus with the goal of "getting the job done the right way" and protecting Verizons" interest. I will try to reduce work order variances, especially on highway jobs.

Manager Comments (Optional)

Fuel our Culture

- **Description and Measures:**Employee Development - job related training-complete minimum (2) training sessions

- Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

- % Management Absence

- Individual Absence Ratio <1%

Recognition

- Employee Accomplishments / Status:Have completed 3 training courses, year-to date. No absences, accidents or recognition.

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/25/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

CONFIDENTIAL

VZ_WALKER_370

District Averages vs Your Averages @ Mid Year:

Prints Issued 136 vs 118

Hours Issued 6503 vs 10,788

ODN HH 97 vs 40

NWC HH 223 vs 46

Average of Fac_Verification 18.2 vs 24.7

SR Number 25 vs 14

George you have gotten the State Highway jobs under control, now you have to get the Facility Verification interval under 8 days. You are currently much higher than our District Average. We are going to have to have more frequent conversations on your held SR.

Employee Comments (Optional)
☒ Manager Signature & Release to Employee

Date: 08/15/2014

☒ Employee Signature

Date: 08/15/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Your Average of Fac_Verification 16.9 vs 12.7 Team's Average

Your SR Number 23 vs 57 Team's Average

George was forced to handle a very difficult situation during 2015, which he handled with utmost class and professionalism. George keeps our Highway work current and is responsible for increasing our stature with the State. George also has kept the work flowing in Downstate, which was and is a huge positive. George needs to continue to learn and improve on SR and HBW responses.

Employee Comments (Optional)

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☒ Manager Signature & Release to Employee

Date: 02/23/2015

☒ Employee Signature

Date: 02/23/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Performing

Signatures :

Employee : George Zang	Date: 2015-02-23
Manager : Brian Magee	Date: 2015-02-23

Exhibit V

2014 Performance

2014 - Year-End Performance Review

Employee: Joseph Scelsa , Engr III Spec-Ntwk Eng&Ops

Manager: Brian Magee, Mgr-Ntwk Eng&Ops

Business Group: Wireline

Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- **Description and Measures:** Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status: Communicate and correspond with many customers on a daily basis with focus on taking accountability for job from start to finish. Implement and project manage job from start to finish by utilizing all facets of Engineering and Construction team for faster service. Coordinate with construction outside work groups for expediting multiple jobs for earlier service order dates and circuit turn-up.

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: Issued 86 HBW jobs to construction to build for revenue generation. Issued 7 FTTCs jobs to construction for EWO opportunity. Issued multiple work orders for MDU and MTU open for sales generating revenue. Issued a total of 471 work orders which included HBW, MTU/MDU Overlay, Greenfield (SFU, MDU, MTU), CWO and other BAU work to construction.

Manager Comments (Optional)

Be More Profitable**- Description and Measures:**

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)**Cost of Removal**

- Employee Accomplishments / Status:Control budget and unnecessary spending by placing enough cable for the job and also for future services, by focusing on the customer future needs. Communicate with customers their capacity needs for future growth. Issued removal jobs and reused plugs and MUX equipment when available to save on the overall cost of HBW jobs. Also consolidated cable where applicable for IIP jobs or migrated to FIOS where available.

Manager Comments (Optional)**Improve the Customer Experience****- Description and Measures:**

Improve network availability.

Meet SR Response Time, SI, Prints on time,ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval – Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- Employee Accomplishments / Status:Met all requirements and goals for calling customer and obtaining site survey dates.

Consistently issued all HBW orders on time and on schedule for ECCD and FAD objectives. Sent all SR's well under 8 day interval for FAD.

Manager Comments (Optional)

Simplify Products, Policies, and Processes

- Description and Measures:Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX Initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status:Follow 4DX model for reducing service order intervals for faster service to customers.

Initiate date for room ready that customer needs to adhere to, for customer desired date of HBW circuit turn-up. Coordinated shorter room ready intervals to be met for HBW circuit turn up.

Manager Comments (Optional)

Fuel our Culture

- Description and Measures:Employee Development - job related training-complete minimum (2) training sessions

• Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

• % Management Absence

• Individual Absence Ratio <1%

Recognition

- Employee Accomplishments / Status: Completed all training classes required on time that were required.
No sick absence days taken at Verizon since being hired in 2000.

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/26/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

CONFIDENTIAL

VZ_WALKER_412

Manager Performance Summary

District Averages vs Your Averages @ Mid Year:

Prints Issued 136 vs 266

Hours Issued 6503 vs 8358

ODN HH 91 vs 73

NWC HH 214 vs 123

Average of Fac_Verification 18.2 vs 21.1

SR Number 25 vs 41

Joe, you are producing solid numbers in all categories except Facility Verification. Your average is above the Team's average and far away from the goal of 8 days. I know we have talked about it before, but you have to get more aggressive with moving these orders.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/14/2014

☒ Employee Signature

Date: 08/14/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

CONFIDENTIAL

VZ_WALKER_413

Your Average of Fac_Verification 17.9 vs 12.7 Team's Average
 Your # of SRs 75 vs 57 Team's Average

Joe's facility verification metric was disappointing; a greater improvement from the Mid-Year was expected. Joe handled a decent volume in his district which included HBW and FTTP. His Customer interactions were positive. Joe is properly engaged in communication with Field Forces and stays current in the progress of the Field. In 2015 Joe needs to stay current with District Initiatives particularly around decreasing intervals.

Employee Comments (Optional)

Research further into formulation used for calculating facility verification, according to report generated for results based on Requestnet. CNE cases shouldn't be included in the results for amount of time it takes to sell the case and build.

☒ Manager Signature & Release to Employee

Date: 02/25/2015

☒ Employee Signature

Date: 02/25/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: **Performing**

Signatures :

Employee : Joseph Scelsa Date: 2015-02-25

Manager : Brian Magee Date: 2015-02-25

Exhibit W

2014 Performance

2014 - Year-End Performance Review

Employee: Joseph D Hui , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- **Description and Measures:** Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status:backing up co-workers
satisfied PUC & customer complaint

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status:(7) MDU overlays
(8) MDU greenfields

Manager Comments (Optional)

Be More Profitable

- Description and Measures:

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status:

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time,ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval - Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- Employee Accomplishments / Status:(2) ATT cell sites

(26) TLS

(6) VON

(1) OC3

(1) VZW cell site

Manager Comments (Optional)

Simplify Products, Policies, and Processes

- Description and Measures:Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status:

Manager Comments (Optional)

Fuel our Culture

- Description and Measures:Employee Development - job related training-complete minimum (2) training sessions

• Complete (6) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

• % Management Absence

• Individual Absence Ratio <1%

Recognition

- Employee Accomplishments / Status:Course Code: VZ47429

Course Code: VZ46633

Course Code: VZ46634

Course Code: VZ46635

Course Code: VZ46636

Course Code: VZ70871

Absence (0%)
Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/25/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

District Averages vs Your Averages @ Mid Year:

Prints Issued 136 vs 131

Hours Issued 6503 vs 5962

ODN HH 91 vs 166

NWC HH 214 vs 402

Average of Fac_Verification 18.2 vs 32

SR Number 25 vs 26

Joe, your numbers are solid except for the Facility Verification number. We have to work on reducing that interval down to 8 days. You have gained alot of HBW experience over the last year, you have to put that

experience to action. Insert yourself into this process and make this change happen.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/14/2014

☒ Employee Signature

Date: 08/14/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

CONFIDENTIAL

VZ_WALKER_434

Your Average of Fac Verification 25.2 vs 12.7 Team's Average
 Your # of SRs 38 vs 57 Team's Average

Joe made progress in 2014 on HBW process, but was unable to significantly reduce the Facility Verification interval. Joe also got his first introduction to FTTP Greenfields in 2014, which was a apartment complex where we were very late in serving. These two items are the priority going forward and Joe needs to improve

his knowledge and response to both disciplines. Joe was also late responding to Grading Requests on multiple occasions, this must be rectified in 2015.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2015

☒ Employee Signature

Date: 02/25/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: **Performing**

Signatures :

Employee : Joseph Hui Date: 2015-02-25

Manager : Brian Magee Date: 2015-02-25

Exhibit X

2014 Performance

2014 - Year-End Performance Review

Employee: Mary T Curtin , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status: Issued 6 PCM work orders to repair existing VZ plant that is deteriorated and focusing on the customer to ensure they have reliable phone service.

Worked as the FIOS On Call Engineer assisting Techs on installs ensuring the customer received service ontime

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: Issued 10 FTTC work orders for VZW and Sprint.
Issued 4 work orders that accounted for 45 MTUs, which accelerates growth
Issued 38 splitter add work orders to avoid held FIOS service orders

Manager Comments (Optional)

Be More Profitable**- Description and Measures:**

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status:ISSUED 4 retirement work orders for a total of \$70,065 reimbursable

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time,ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval – Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- Employee Accomplishments / Status:Worked on the following projects:

moving OC12 private ring for Astra Zeneca

turning up a new OC192 ring for Incyte Corporation

Answered approximately 258 SRs both Inquiries and Firm orders

Issued 139 HBW work orders

Manager Comments (Optional)

Simplify Products, Policies, and Processes

- Description and Measures:Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status:

Manager Comments (Optional)

Fuel our Culture

- Description and Measures:Employee Development - job related training-complete minimum (2) training sessions

• Complete (7) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

• % Management Absence

• Individual Absence Ratio <1%

Recognition

- Employee Accomplishments / Status:completed the courses:

Driver Safety Series: Changing Lanes

CPNI Annual Training 2014-2015

Driver Safety Series: Slow Down and Live

Driver Safety Series: Safe Intersection Techniques

2014 Antitrust Law
Driver Safety Series: Do Not Be a Tailgater
Drivers Safety Series: Sharing the Road

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/25/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

CONFIDENTIAL

VZ_WALKER_475

Manager Performance Summary

District Averages vs Your Averages @ Mid Year:

Prints Issued 136 vs 187

Hours Issued 6503 vs 9733

ODN HH 97 vs 63

NWC HH 223 vs 57

Average of Fac Verification 18.2 vs 19.3

SR Numbers 25 vs 64

Mary you have very good results, except for Fac Verification. 19.3 is not acceptable. With your volume of orders and years in that turf, I would expect to see more Fac Yes replies. We need to have more frequent conversations on your held SRs.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/15/2014

☒ Employee Signature

Date: 08/15/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Your Average of Fac Verification 13.4 vs 12.7 Team's Average

Your SR Number 120 vs 57 Team's Average

Mary led the Team in the number of SRs worked in 2014, this was a huge achievement. Mary's effort and drive are second to none. She works collaboratively with fellow Engineers, Planners and Field Forces to succeed. Mary is a key asset in the Delaware and I am glad she is there!!

Employee Comments (Optional)☒ Manager Signature & Release to Employee

Date: 02/23/2015

☒ Employee Signature

Date: 02/23/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Performing

Signatures :

Employee : Mary Curtin

Date: 2015-02-23

CONFIDENTIAL**VZ_WALKER_477**

Manager : Brian Magee

Date: 2015-02-23

CONFIDENTIAL

VZ_WALKER_478

Exhibit Y

2014 Performance

2014 - Year-End Performance Review

Employee: Maria C Cesare , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status:

Customer focus is of the utmost importance, I apply a sense of urgency to anything that comes across my desk and remain accountable through the duration of the issue to completion. Examples of this are Fios order follow up - that are not completed to fruition and require hand-holding in order for customers to be able to order service. (622 N 2nd St and 736 S 11th St are two examples of tremendous follow thru for

ordering ability)

I have also played an integral role in the training and support of engineering intern - apprising him of our day to day functionality and assisting in any and all items that arise.

Manager Comments (Optional)**Grow Revenue****- Description and Measures:**

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: I take a proactive approach on all site surveys and customer visits to insure the customer is positioned for future growth as well as recommending any products or services that I think will be both beneficial to the customer while promoting the company. My site surveys are completed as soon as possible in an attempt to provide outstanding service to the customer and start the revenue generation for the company.

Manager Comments (Optional)**Be More Profitable****- Description and Measures:**

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status: Cost cutting and efficiency are always addressed and researched to meet the bottom line. Keeping paper, energy and fuel consumption to a minimum is a matter that is regularly visited not only for the bottom line but also for the environment. Paper copies are kept to a minimum and as many surveys that can be done on foot are.

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time, ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval – Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- Employee Accomplishments / Status:The customer is always first. SR response time and prints on time are the first matter of business every day.

Manager Comments (Optional)

Simplify Products, Policies, and Processes

- Description and Measures:Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status:Results and accountability are always at the forefront. WIG's are reviewed at all team meetings and their importance is reinforced.

Manager Comments (Optional)

Fuel our Culture

- Description and Measures:Employee Development - job related training-complete minimum (2) training sessions

• Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

• % Management Absence

• Individual Absence Ratio <1%

Recognition

- Employee Accomplishments / Status:Zero absence and all training has been completed.

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/25/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

CONFIDENTIAL

VZ_WALKER_454

Manager Performance Summary

District Averages vs Your Averages @ Mid Year:
Prints Issued 136 vs 349
Hours Issued 6503 vs 13,404
ODN HH 97 vs 50
NWC HH 223 vs 270
Average of Fac Verification 18.2 vs 13.8
SR Numbers 25 vs 40

Maria, your numbers are great so far this year. They reflect your hard work and dedication!! Your Facility Verification is better than the Team's Average, but I need it to go lower, the goal is 8 calendar days. Please continue along this path success is near!!

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/14/2014

☒ Employee Signature

Date: 08/14/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

CONFIDENTIAL

VZ_WALKER_455

Your Average of Fac Verification 12.5 vs 12.7 Team's Average
 Your # of SRs 68 vs 57 Team's Average

Maria is fearless, she volunteered to take on one of the most difficult HBW Turfs at the time when 4DX was putting a greater emphasis on HBW. She handled a high volume of SRs during the year and was able to move the Facility Verification Interval below the Team's Average, but fell short of moving it below the

metric of 8 days. In 2014 Maria continued to grow in the Turf role, taking a leadership role with our Intern. Maria guided and assisted in training him, facilitating a very quick upload of Engineering Training. Maria has quickly become a key member of the Philadelphia Team, I am glad to have her on the Team!

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2015

☒ Employee Signature

Date: 02/25/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating:**Performing**

Signatures :

Employee : Maria Cesare

Date: 2015-02-25

Manager : Brian Magee

Date: 2015-02-25

Exhibit Z

2014 Performance

2014 - Year-End Performance Review

Employee: Steven C Murphy , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- **Description and Measures:** Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status:

-I have actively assisted other engineers with aspects of the job to help them learn different unfamiliar functions of the job and if needed I have run with and done the EWO myself j (e:litespan/SLC,TEO's,etc.,)

- I have handled most Litespan functions throughout the City including contacting the groups necessary to get the NAVY Litespan systems woken up to be ready for fiber transfer work
-I actively engage others help

with areas I am not familiar with or new, this aids both

- always looking for a better way to do things and I will incorporate many ideas I see others use to help me be more efficient myself and the customer

- I work closely with many people and groups inside Verizon as well as customer/end user ,carrier ,contractors(Verizon and customer)and to get work accomplished

Manager Comments (Optional)

ALL COMMENTS MUST BE APPROVED BY THE MANAGER

Grow Revenue**- Description and Measures:**

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status:-Cell site job for AT&T

- Issued one IOF backbone EWO

- Supplied Sales Reps FTTP leads
- 15+FTTCS sites:
- 35 + FTTP sites mixed greenfield,Brownfield and .Overlay
- Engineered Dilworth Plaza facilities and worked to expedite the build to have ready for Grand Opening
- assisted in planning FTTP layout for VZ FIOS Sales promo at 1500 Market
- 1900 Arch St FTTP service delivery job
- Handles numerous facility move/transfer/ removal jobs to make way for demo's

Manager Comments (Optional)**Be More Profitable****- Description and Measures:**

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- **Employee Accomplishments / Status:** Reuse materials as appropriate and available(Muxs ,PICS) to cut down job expense.
 - Examine and design jobs to make sure that they not only meet present customer needs but if possible will address future needs of that or other potential customers thereby reducing future work(. I was presently examing and had been in contact with bldg managers at high rises in Locust for addressing Next Gen mux needs at RDP Tecom rooms.

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time,ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval – Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- Employee Accomplishments / Status:

- 65+ TLS SR's
- 35+ HBW SR's
- 6+ Equipment removal work orders
- 7 DS1 Fiber Initiative jobs

Engineered and worked directly with the Verizon groups, GC's, State & local personnel to get the facilities for the new Courthouse at 1501 Arch St in place. This has been a challenge as there has been no one main contact person in regards to service requirements for this job. This was not always an easy task as there was no

one point of contact.

- I have assisted outside work forces with engineering 4 +major cable failures including one feeding City Hall.
- Continuing to work and improve SR interval turnaround
- Meeting prints issued requirement

Manager Comments (Optional)**Simplify Products, Policies, and Processes**

- **Description and Measures:** Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- **Employee Accomplishments / Status:** -Completed 1 CWS experiment job at 1760 Market St-flr 8 and assisted with one in Eastwick
- Have been handling ESS jobs regularly in many cases surveying prior to desired date .

- Working to Drop SR turnaround time to work toward 4 DX initiative
- Meeting SR Interval reduction initiative
- Have met EWO issue date initiative

Manager Comments (Optional)

Fuel our Culture

- **Description and Measures:** Employee Development - job related training-complete minimum (2) training sessions

- Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

- % Management Absence

- Individual Absence Ratio <1%

Recognition

- **Employee Accomplishments / Status:** Completed 2 driving courses
- Completed 3 Corporate required courses
- Completed course on ICGS fiber splitting
- Attended several vendor initiated presentations to stay up with new equipment Absences: 0 (Thank God)

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

--

Employee Comments (Optional)

--

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/26/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

District Averages vs Your Averages @ Mid Year:
Prints Issued 136 vs 163
Hours Issued 6503 vs 13,400
ODN HH 97 vs 0
NWC HH 223 vs 699
Average of Fac Verification 18.2 vs 20.5
SR Number 25 vs 45

Your numbers are strong, save your Fac Verification results. The target for Fac Verification is 8 days and you are North of the Team's Average of 18.2 days. You have to get more aggressive with moving the SRs.

Employee Comments (Optional)

--

☒ Manager Signature & Release to Employee

Date: 08/14/2014

CONFIDENTIAL

VZ_WALKER_541

☒ Employee Signature

Date: 08/14/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Your Average of Fac Verification 15.7 vs 12.7 Team's Average
Your # of SRs 77 vs 57 Team's Average

Steve managed to reduce his Facility Verification interval, but still fell short of beating the Team's Average; this can not continue into 2015. Steve also struggled with the FTTP component of his Locust Turf Area; in 2015 he will face a lessened demand and he must gain traction on changing the timetable of his

deliverables. The last area of concern is the chronic late responses to Grading Updates. Steve has talent and has done many positive items in 2014, but he needs to dig in and fix the negative trends.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/24/2015

☒ Employee Signature

Date: 02/24/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position. - New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee. - Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Performing

Signatures :

Employee : Steven Murphy Date: 2015-02-24

Manager : Brian Magee Date: 2015-02-24

Exhibit AA

2014 Performance

2014 - Year-End Performance Review

Employee: Scott C Panichelli , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- **Description and Measures:** Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status: Customer focus and sense of urgency was demonstrated by quickly issuing 5 FTTP work orders last year from field employee referrals. All these resulted in sales.

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: Fiber to the Cell Site 7

Site Survey 7

EWOs Issued 63

FTTC E2E Macro Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades 1

Total Prems Passed Incr 232

Total Prems Open for Sale Incr

MXU Open for Sale Incr 27

MTU Open For Sales

Manager Comments (Optional)

Be More Profitable

- Description and Measures:

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability
Capital Spend
Expense
Spend
Network Engineering Mgmt Headcount (FTE)
Energy Reduction
Retirements (\$M)
Cost of Removal
- Employee Accomplishments / Status:DS1 4
DS3
OC-N
FTTP Unit Costs
12-mo Rolling \$ Cost Per Prem Passed
12-mo Rolling \$ Cost Per MDU NC
12-mo Rolling \$ Cost Per MTU NC
Standard \$ Cost Per Prem Passed \$900
Standard \$ Cost Per MDU NC \$325
Network Reliability
Capital Spend
Expense Spend
Energy Reduction
Retirements (\$M)
Cost of Removal
Manager Comments (Optional)

Improve the Customer Experience**- Description and Measures:**

Improve network availability.

Meet SR Response Time, SI, Prints on time,ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval – Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- Employee Accomplishments / Status:Request Net Intervals - SR Response On Time

SR Response Interval – Overall 48 hrs

SR Response Interval - Ethernet 48hrs

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time 100%

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

Manager Comments (Optional)**Simplify Products, Policies, and Processes****- Description and Measures:**Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX Initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status:Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

Manager Comments (Optional)**Fuel our Culture****- Description and Measures:**Employee Development - job related training-complete minimum (2) training sessions

• Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

• % Management Absence

• Individual Absence Ratio <1%

Recognition
- Employee Accomplishments / Status: Completed 2 courses
No MV accidents
0 absence
Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/26/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

CONFIDENTIAL

VZ_WALKER_519

Manager Performance Summary

District Averages vs Your Averages @ Mid Year:

Prints Issued 138 vs 74

Hours Issued 6503 vs 5364

ODN HH 97 vs 333

NWC HH 214 vs 370

Average of Fac Verification 18.2 vs 15.2

SR numbers 25 vs 11

Scott, your results are solid. Your Fac Verification number was a nice surprise. Keep up the good work and continue to drive that interval down. 8 is the goal for Fac Verification, let's make it happen by increasing the Fac Yes replies.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/15/2014

☒ Employee Signature

Date: 08/15/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

CONFIDENTIAL

VZ_WALKER_520

Your Average of Fac Verification 8.6 vs 12.7 Team's Average
 SR numbers 18 vs 57 Team's Average

Scott did very well with the demands and changes in procedures of 2014. He made a solid contribution to the Team with his Facility Verification hours. He also made a solid contribution to the District by working through the National Greenfield process. Scott continues to be a valuable member of the Delaware Team!

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/23/2015

☒ Employee Signature

Date: 02/23/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position. - New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee. - Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: **Performing**

Signatures :

Employee : Scott Panichelli

Date: 2015-02-23

Manager : Brian Magee

Date: 2015-02-23

Exhibit BB

2014 Performance

2014 - Year-End Performance Review

Employee: John Shubrook , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status:MODELED THE CREDO

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status:ISSUED 205 EWOS

53 3RD PARTY EWOS

6 COPPER EWOS

3 CWOS

6 DAMAGE EWOS

56 HBW EWOS

13 FTTCS EWOS

17 FIOS GREENFIELDS EWOS (305 UNITS)

3 FIOS MTUS EWOS (34 UNITS)

14 FIOS OVERLAY EWOS (97 UNITS)

34 SPLITTER ADDS

Manager Comments (Optional)

Be More Profitable

- Description and Measures:

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

<p>Network Reliability</p> <p>Capital Spend</p> <p>Expense</p> <p>Spend</p> <p>Network Engineering Mgmt Headcount (FTE)</p> <p>Energy Reduction</p> <p>Retirements (\$M)</p> <p>Cost of Removal</p> <p>- Employee Accomplishments / Status: RETIRED UNUSED SONEPLEX AND LITESPAN EQUIPMENT FROM DOVER MALL. CREATED STANDARD MUX CABINETS TO REDUCE HBW INTERVALS.</p> <p>Manager Comments (Optional)</p>

<p>Improve the Customer Experience</p> <p>- Description and Measures:</p> <p>Improve network availability.</p> <p>Meet SR Response Time, SI, Prints on time, ECCD and FAD objectives.</p> <p>Leverage technology to deliver network and services reliability.</p> <p>Apply a customer - first - attitude to all transactions, products and services.</p> <p>Improve quality continuously across all departments including internal and external customer services.</p> <p>Meet customer requirements through an always on, dependable and scalable network.</p> <p>Request Net Intervals - SR Response On Time</p> <p>SR Response Interval – Overall</p> <p>SR Response Interval - Ethernet</p> <p>DS1</p> <p>DS3</p> <p>OC-N</p> <p>Ethernet</p> <p>Standard Interval Compliance</p> <p>Prints Issued On Time</p>
--

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- **Employee Accomplishments / Status:**100% SR RESPONDED ON TIME

100% STANDARD AND REDUCED INTERVAL COMPLIANCE

100% PRINTS ISSUED ON TIME

Manager Comments (Optional)

Simplify Products, Policies, and Processes

• **Description and Measures:**Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- **Employee Accomplishments / Status:**ATTENDED 4DX MEETING AND HELPED DEVELOP WIG OBJECTIVES. TRAINED ENGINEERS ON EQUIPMENT FOR HBW ORDERS.

Manager Comments (Optional)

Fuel our Culture

• **Description and Measures:**Employee Development - job related training-complete minimum (2) training sessions

• Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%) <ul style="list-style-type: none">• % Management Absence• Individual Absence Ratio <1% Recognition <ul style="list-style-type: none">- Employee Accomplishments / Status: COMPLETED REQUIRED TRAINING COURSES ZERO ACCIDENTS ZERO ABSENCES RECIEVED RECOGNITION AWARD FROM DOUG SMITH FOR WORK ON JPMC PROJECT Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/26/2014

CONFIDENTIAL

VZ_WALKER_390

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

District Averages vs Your Averages Mid Year:

Prints Issued 136 vs 91

Hours Issued 6503 vs 6680

ODN HH 97 vs 242

NWC HH 223 vs 242

Average of Fac Verification 18.2 vs 15.1

SR Numbers 25 vs 21

John, your results are solid. The Fac Verification number is good, but it still needs to go lower. 8 days is the target that I need you to attain. You have the skills and education, you can figure this out.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/15/2014

☒ Employee Signature

Date: 08/15/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Your Average of Fac Verification 7.9 vs 12.7 Team Average
 Your SR Number 43 vs 57 Team Average

John made a significant contribution to the HBW improvements projects of 2014. He managed to pull his Facility Verification number under the 2014 Objective. He also was a resource across my District on HBW issues. John was quick to help the Downstate Team with workload due to an Employees illness, which was great Teamwork. John is valuable employee and I am glad to have him in Delaware!

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/23/2015

☒ Employee Signature

Date: 02/23/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position. - New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee. - Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating:**Performing**

Signatures :

Employee : John Shubrook Date: 2015-02-23

Manager : Brian Magee Date: 2015-02-23

Exhibit CC

2014 Performance

2014 - Year-End Performance Review

Employee: Paul Klauss , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status: My default method of operation is to work with the customer in mind, to take ownership and personal responsibility of my work, to work quickly, efficiently and accurately as possible, to work ethically and to work with an awareness that I represent the company in all customer interactions.

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: In my new turf, took over responsibility of 3 large Greenfield SFU developments.

I Issued all fiber to the cell site jobs in my territory on time. Ensured that all PICS and associated materials arrived on time.

Made sure orders arrived on time.

Manager Comments (Optional)

Be More Profitable**- Description and Measures:**

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status: In my new turf, took over responsibility of 3 large Greenfield SFU developments.
I issued all fiber to the cell site jobs in my territory on time. Ensured that all PICS and associated materials arrived on time.

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time, ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval - Overall

SR Response Interval - Ethernet

DS1

DS3

OC-N

Ethernet

Standard Interval Compliance

Prints Issued On Time

FAD Scheduled Date Met

LBW & HBW

ECCD On Time Performance

LBW & HBW

- Employee Accomplishments / Status:

Met the SR overall response time in May with 24 SR's.

Stayed up to date with new technology. Issued an OC192 Ring in Paoli Central Office for Siemens Corporation, used new 4100 ES OC192 functionality.

For all SR's, I contacted the customer immediately and set up immediate site surveys. Looked for alternate ways to set up surveys if the site contact was unavailable.

I continued to keep the customer informed, after

the SR's were released. I stayed involved in the construction build and the circuit turn up to ensure that, in addition to meeting my personal measurements, the overall service order due dates were met.

Manager Comments (Optional)

Simplify Products, Policies, and Processes

- Description and Measures: Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- Employee Accomplishments / Status: Issued all work orders on time.

Responded to customer demand with a sense of urgency.

Manager Comments (Optional)

Fuel our Culture

- Description and Measures: Employee Development - job related training-complete minimum (2) training sessions

• Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

- % Management Absence

- Individual Absence Ratio <1%

Recognition

- Employee Accomplishments / Status: I stayed current on all methods and procedures for FIOS, Vbuild, Requestnet, and other engineering systems. I participated in requestnet and vbuild training.

I completed all required safety training.

I have zero absences.

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/25/2014

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Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

District Averages vs Your Averages @ Mid Year:

Prints Issued 136 vs 258

Hours Issued 6503 vs 11,245

ODN HH 97 vs 397

NWC HH 223 vs 791

Average of Fac Verification 18.2 vs 9.1

SR Number 25 vs 36

Paul your numbers look great. Your volumes are high and you are doing fantastic with the Facility Verification Objective. Keep up the good work and don't be shy about sharing your lessons learned on our WIG Calls.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/14/2014

☒ Employee Signature

Date: 08/14/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

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Your Average of Fac Verification 7.9 vs 12.7 Team's Average
 Your # of SRs 70 vs 57 Team's Average

Paul succeeded in moving his Facility Verification number below the objective of 8 days. Paul owns the SR Process, his knowledge, experience and tenacity have put him in an elite category. Paul handles a high volume of work with a can do attitude. I am very glad to have Paul on the Team!!

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2015

☒ Employee Signature

Date: 02/25/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: **Performing**

Signatures :

Employee : Paul Klauss Date: 2015-02-25

Manager : Brian Magee Date: 2015-02-25

Exhibit DD



RATE AND RANK EMPLOYEES

REDUCTION IN FORCE EMPLOYEE RATING FORM

Plan: Mgmt Prog Enterprise Wireline

Business Case Number: RIFV102777

Anticipated Notification Date: 4/23/2015

For Partial Group Elimination after rating is complete indicate "RM"(Retained) or "IM" (Impacted) in last column. Complete Anticipated Notification Date for all "IM"s. Rating criteria/Competencies/Dimensions/Critical aspects of the job across the workgroup. Assure rating is Completed by individual(s) familiar with employee work history. Comment must be provided for scores of 1 or 5

Ratings Completed By: Parker,Melissa

Phone: 908/559-5544

*Skills Assessed in "Primary Skillset Proficiency" include: HBW Proficiency - Request Net, Survey and Design

*Explain Criteria of "Other" Column Assessment: FTTP Proficiency - Survey and Design

Responsible HR Rep Name/Phone: Parker,Melissa / 908/559-5544

Business Case Number: RIFV102777 Setid : COMMN EmpId: 1176609 EmpName: Panichelli,Scott C

Primary Skills Comments:

Technical Knowledge Comments:

Credo Comments:

Others Comments: Scott is an expert in FTTP Design (including ICGS and IVAPP) and Equipment. He is responsible for the Fiber Deployment in the fastest growing area of Delaware. He serves as a resource to the DE Team.

Corrective Comments:

Business Case Number: RIFV102777 Setid : COMMN EmpId: 1197216 EmpName: Walker,Suzette E

Primary Skills Comments: Suzette Request Net knowledge is still developing (YTD FAC Verification 19 compared to Team average 10). She also does not possess the skills to survey and design all HBW orders. Compared to the overall Team her skill set is lower than her peers. Suzette received a D rating in 2013 as she hadn't learned the core engineering role as quickly as expected and was more administrative than proficient in the engineering role.

Technical Knowledge Comments: Suzette does not demonstrate a sufficient level of technical knowledge of the DS0 and HBW electronics in use today. Suzette has received technical training but has not retained the training as expected and relies on others to complete the technical aspects of the role.

Credo Comments:

Others Comments: Suzette does not exhibit strong ICGS (records system) skills regarding design. She is also developing in the ability to survey and design FTTP SFU, MDU and MTU properties as she has not become as proficient as necessary.

Corrective Comments:

Business Case Number: RIFV102777 Setid : COMMN EmpId: 1243368 EmpName: Hul,Joseph D

Primary Skills Comments:

Technical Knowledge Comments:

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1256659 **EmpName:** Hodge JR,Thomas J

Primary Skills Comments: Tom's Request Net Knowledge is advanced (YTD FAC Verification 8 compared to Team average 10). Excellent knowledge of the HBW flow. Acts as a resource to the Philadelphia Team on coding of SRs in RequestNet.

Technical Knowledge Comments:

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1275909 **EmpName:** Murphy,Steven C

Primary Skills Comments:

Technical Knowledge Comments:

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1304335 **EmpName:** Cesare,Maria C

Primary Skills Comments:

Technical Knowledge Comments:

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1314072 **EmpName:** Curtin,Mary T

Primary Skills Comments: Mary's knowledge of the Request Net Flow is advanced (YTD FAC Verification 7 compared to Team average 10). She is also an excellent resource for HBW process and flow. Mary manages the highest volume of orders in the District with great efficiency.

Technical Knowledge Comments:

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1353185 **EmpName:** Bowman JR,Carl E

Primary Skills Comments:

Technical Knowledge Comments:

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1367340 **EmpName:** Zang,George W

Primary Skills Comments:

Technical Knowledge Comments:

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1368828 **EmpName:** Padovani,Ernest A

Primary Skills Comments:

Technical Knowledge Comments:

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1407427 **EmpName:** Shubrook,John

Primary Skills Comments: John is advanced in Request Net (YTD FAC Verification 4 compared to Team average 10). He is also a District wide resource on HBW procedures. His knowledge base is extensive and he shares it freely with the Team including Planning.

Technical Knowledge Comments: John's experience in IOF and OSP is unmatched in the District today. He is routinely called upon to offer advice to fellow Engineers across the District.

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1409702 **EmpName:** Perry,David M

Primary Skills Comments: Dave has made great strides in learning the Request Net flow and is below Team Average for Facility Verification YTD (9 versus Team Average 10) but is ranked above Suzette as he is gaining knowledge much more quickly. Dave still needs to expand his knowledge of HBW service types and the design of those orders.

Technical Knowledge Comments:

Credo Comments:

Others Comments: Dave is still developing his knowledge of ICGS and FTTP design but is learning quickly.

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1462649 **EmpName:** Scelsa,Joseph

Primary Skills Comments:

Technical Knowledge Comments:

Credo Comments:

Others Comments:

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1498910 **EmpName:** Klaus,Paul

Primary Skills Comments: Paul is an expert in the HBW process flow. He was transferred last year to a District with high demand for HBW services; he successfully made the transition and contributed to improvements in the District's HBW Results. Paul is called upon often by Team Members to assist with process questions.

Technical Knowledge Comments:

Credo Comments:

Others Comments: Paul is excellent in ICGS, IVAPP and FTTP Design. He is able to survey and design his own developments, which results in quicker turnarounds of prints and higher quality.

Corrective Comments:

Business Case Number: RIFV102777 **SetId :** COMMN **EmpId:** 1509712 **EmpName:** Portolese,Anthony S

Primary Skills Comments:

Technical Knowledge Comments:

Credo Comments:

Others Comments: Anthony is excellent with ICGS and FTTP Design. He worked on the Overlay Team in the past and has stayed current with all design considerations. He is a resource for the Team on FTTP issues.

Corrective Comments:

RATE AND RANK EMPLOYEES**REDUCTION IN FORCE EMPLOYEE RATING FORM**

Business Case Number: RHFV102777

Plan: Mgmt Prog Enterprise Wireline

Anticipated Notification Date: 4/23/2015

For Partial Group Elimination after rating is complete indicate "RM" (Retained) or "IM" (Impacted) in last column. Complete Anticipated Notification Date for all "IM"s. Rating criteria/Competencies/Dimensions/Critical aspects of the job across the workgroup. Assess rating is Completed by individual(s) familiar with employee work history. Comment must be provided for scores of 1 or 5

Ratings Completed By: Parker, Melissa

Phone: 908/559-5544

*Skills Assessed in "Primary Skillset Proficiency" include: HEW Proficiency - Request Net, Survey and Design

*Explain Criteria of "Other" Column Assessment: FTTP Proficiency - Survey and Design

Responsible HR Rep Name/Phone: Parker, Melissa / 908/559-5544

Name	Job Title	Band	Location Description	Job Entry Date	2014 Perf	2015 Perf	Prim Skill	Tech Know	Credo	Others	Corr Action	Total	IM/RM
Panichelli, Scott C	Engr III Spec-Ntwk Eng&Ops	7T	Marshallton, DE	3/4/2012	3	3	3	3	4	3	5	0	21 RM
Walker, Suzanne E	Engr III Spec-Ntwk Eng&Ops	7T	Philadelphia, PA	12/9/2012	1	3	2	2	3	3	2	0	13 IM
Hui, Joseph D	Engr III Spec-Ntwk Eng&Ops	7T	Philadelphia, PA	5/11/2009	3	3	3	3	3	3	3	0	18 RM
Hodge JR, Thomas J	Engr III Spec-Ntwk Eng&Ops	7T	Philadelphia, PA	11/11/2012	3	5	5	4	4	4	3	0	24 RM
Murphy, Steven C	Engr III Spec-Ntwk Eng&Ops	7T	Philadelphia, PA	5/11/2003	3	3	3	3	3	3	2	0	17 RM
Cesare, Maria C	Engr III Spec-Ntwk Eng&Ops	7T	Philadelphia, PA	4/8/2007	3	3	3	3	3	3	2	0	17 RM
Curtin, Mary T	Engr III Spec-Ntwk Eng&Ops	7T	Exton, PA	2/1/2004	3	3	5	4	4	4	3	0	22 RM
Bowman JR, Carl E	Engr III Spec-Ntwk Eng&Ops	7T	Exton, PA	3/26/2006	3	3	3	3	3	3	3	0	18 RM
Zang, George W	Engr III Spec-Ntwk Eng&Ops	7T	Milford, DE	2/15/2004	3	3	3	3	4	4	3	0	20 RM
Padorani, Ernest A	Engr III Spec-Ntwk Eng&Ops	7T	Marshallton, DE	1/16/2005	3	3	3	3	3	3	3	0	18 RM

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Shubert, John	Engr III Spec-Ntwk Eng&Ops	7T	Marshallton, DE	3/4/2012	3	3	5	5	3	3	0	22 RM
Perry, David M	Engr III Spec-Ntwk Eng&Ops	7T	Philadelphia, PA	5/25/2014	1	3	2	4	3	2	0	15 RM
Scelsa, Joseph	Engr III Spec-Ntwk Eng&Ops	7T	Exton, PA	11/23/2003	3	3	3	3	3	3	0	18 RM
Klaass, Paul	Engr III Spec-Ntwk Eng&Ops	7T	Philadelphia, PA	2/23/2004	5	3	5	4	4	5	0	26 RM
Portolese, Anthony S	Engr III Spec-Ntwk Eng&Ops	7T	Philadelphia, PA	4/27/2014	3	3	2	4	3	5	0	20 RM

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Def_Walker_023

Exhibit EE

2014 Performance

2014 - Year-End Performance Review

Employee: Thomas J Hodge JR, Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status: I work with & encourage my colleagues to operate efficiently & ethically to meet the customers expectations. Work with my newer colleagues to help them learn the daily work flow and the systems required. Help them prioritize their daily work load.

I had perfect attendance this year & schedule my vacation responsibly.

Expedited a new OC192 and FW9500 MUX on an expedited schedule to provision a GIGE VON for the Philadelphia Eagles season.

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: Worked on an SFP /PICS process with an Engineering and SDA team to shorten intervals on hicap provisioning. Known as the "facility yes SR" process. This process is now rolling out to our entire district. Significant impact on our intervals.

Manager Comments (Optional)**Be More Profitable****- Description and Measures:**

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Network Engineering Mgmt Headcount (FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status:

Transitioned new a new turf to better manage the hicap work load. I was able to decrease the held orders and answer the orders quicker to actualize the revenue sooner.

I work with Planning to design our jobs to meet the existing customer's expectations and properly plan for the next customer. Most Locust buildings that I worked in this year now have new OC48 rings in the basement for easier hicap provisioning.

Example:

Phila Eagles & Phila Flyers. Both areana had orders for new GIGE VONS. We have several muxes at each location. Space & power are scarce. Installed the 1st FW9500 on an OC192 at the Eagles and the 1st FW4100ES on an OC192 at the Flyers. Both locations are well positioned for future growth at a reasonable cost.

To date I have completed 4 DS1 initiative fiber builds and 4 Chronic DS1 work orders. This will have a postive impact on reliability and reduce maintenance costs.

Manager Comments (Optional)

Improve the Customer Experience

- Description and Measures:

Improve network availability.

Meet SR Response Time, SI, Prints on time,ECCD and FAD objectives.

Leverage technology to deliver network and services reliability.

Apply a customer - first - attitude to all transactions, products and services.

Improve quality continuously across all departments including internal and external customer services.

Meet customer requirements through an always on, dependable and scalable network.

Request Net Intervals - SR Response On Time

SR Response Interval – Overall

SR Response Interval - Ethernet

DS1

DS3

<p>OC-N</p> <p>Ethernet</p> <p>Standard Interval Compliance</p> <p>Prints Issued On Time</p> <p>FAD Scheduled Date Met</p> <p>LBW & HBW</p> <p>ECCD On Time Performance</p> <p>LBW & HBW</p> <p>- Employee Accomplishments / Status:100% standard interval compliance.</p> <p>100% prints issued on time.</p> <p>Follow Requestnet bucket & Prints issued reports to verify that our Engineering Team is & stays compliant with the objectives.</p> <p>When an EWO is completed before ECCD I have the service order DD pulled in for an earlier completion to actualize the revenue sooner.</p> <p>Manager Comments (Optional)</p>

<p>Simplify Products,Policies, and Processes</p> <p>- Description and Measures:Get the job done the right way.</p> <p>Be accountable for results, adhere to our core values and operate with a sense of urgency.</p> <p>Incorporate a CWS experiment.</p> <p>Drive change and innovation that brings results to the bottom line.</p> <p>100% Implementation of (IOF) EPM</p> <p>Achieve WIG Objective</p> <p>Implement 4 DX initiative</p> <p>Reduce CIP %</p> <p>Reduce work order variance %</p> <p>- Employee Accomplishments / Status:I was part of the initial 4DX roll out & helped our team to get up to speed & understand our WIG.</p> <p>Worked on the SFP "facility yes" experiment to positively impact & shorten our hicap interval. District WIG.</p>
--

Manager Comments (Optional)

Fuel our Culture

- **Description and Measures:** Employee Development - job related training-complete minimum (2) training sessions

- Complete (2) training courses

Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents

Absence (%)

- % Management Absence
- Individual Absence Ratio <1%

Recognition

- **Employee Accomplishments / Status:** Completed all required VZLearn courses to date.

Attended 3 Vendor training sessions to update knowledge on Hicap electronics.

Completed required Motor Vehicle VZLearn courses with no MV accidents.

Perfect Attendance.

Tutored colleagues.

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

--

Employee Comments (Optional)

--

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/25/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

District Averages vs Your Averages @ Mid Year:
Prints Issued 136 vs 122
Hours Issued 6503 vs 4283
ODN HH 97 vs 28
NWC HH 223 vs 106
Average of Fac Verification 18.2 vs 4.8
SR Numbers 25 vs 22

Tom, your numbers look great, you are crushing the Facility Verification Objective. You also did a great job with the SFPs to SDA initiative. Also of note is the Leadership that you bring to the Team, you help drive behavior and helps me out a great deal.

Employee Comments (Optional)

--

☒ Manager Signature & Release to Employee

Date: 08/14/2014

☒ Employee Signature

Date: 08/14/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Your Average of Fac Verification 5.4 vs 12.7 Team's Average
SR Numbers 61 vs 57 Team's Average

Tom took hold of the 4DX principles and made radical changes in his, the Team's and the Districts handling of HBW orders. Tom lead by example, reducing his Facility Verification interval down below target. Tom also helped develop and institute the SFP Process that was implemented across EPA-DE. Tom was also relied upon throughout the year to perform extra duties when issues arose, he was always willing and able to help out. Tom is a key asset of the Philadelphia/Delaware Team.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2015

☒ Employee Signature

Date: 02/25/2015

Section 5 - Performance Rating

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Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: **Leading**

Signatures :

Employee : Thomas Hodge

Date: 2015-02-25

Manager : Brian Magee

Date: 2015-02-25

Exhibit FF

2014 Performance

2014 - Year-End Performance Review

Employee: David M Perry , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group:Wireline
Band:7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Supervisor Responsibilities

- Description and Measures:

As a Verizon leader, drive business results by building and developing a strong diverse team and

maximizing team performance. Specific measures include:

1. Setting and communicating objectives and priorities and providing ongoing direction
2. Completing all required performance documents and conducting associated performance discussions (performance agreement/objectives, mid-year review, year-end review) by required deadlines
3. Providing ongoing performance feedback, coaching, training and development
4. Taking appropriate performance improvement action, or administering appropriate discipline when employees do not meet performance standards or expectations
5. Ensuring a safe and ethical work environment by complying with the Code of Conduct and all Company policies

- Employee Accomplishments / Status: 1st half 2014 I&M Local Manager (ranked in top 5% for overall performance)

1. completed 2014 performance agreements
2. completed 2013 EOY appraisals for direct reports
3. conducted monthly coaching and performance documentation
4. conducted quality assurance reviews and administered discipline accordingly
5. conducted all required safety training and code of conduct training

Manager Comments (Optional)

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status: Utilizes knowledge of outside plant operations and dedication to improving the customer experience to cross-train in new OSP position.

Manager Comments (Optional)

Improve Profitability:

- Description and Measures: Drive Profitability Higher.

Concentrate our energy on things that drive customer involvement and eliminate things that don't.

- Employee Accomplishments / Status: 6 month period as OSP engineer

Answered 78 HBW SRs

Processed 212 EWOs for HBW/BAU/FTTP

Manager Comments (Optional)

Innovation/Personal Commitment:	
<p>- Description and Measures: Roll-out and successfully implement the migrations plan. Implement 2014 Communication Plan to drive consistent behavior, set expectations and explain the "Why". Maximize all migration opportunities Manage Customer Care Database by ensuring all maintenance plans are expedited.</p>	
<p>- Employee Accomplishments / Status:</p> <p>1st half worked as local manager in NJ for I&M and cable maintenance.</p> <ul style="list-style-type: none"> -Stayed current w/ position requirements-safety/quality/coaching/meetings -Zero occupational injuries or motor vehicle accidents -Ranked in top 10 local managers statewide for overall performance -Instrumental in PPM programs in chronic trouble locations -Month over month improvement <p>Selected to a position w/ outside plant engineering</p> <ul style="list-style-type: none"> -Immediately assigned turf and began performing job functions -Diligently working with peers to become proficient 360 design engineer -Completed following NetLearn Courses <ul style="list-style-type: none"> -Intro to TIRKS -TIRKS-Netsuites Overview -Introduction to IDDS -all required departmental training. 	
Manager Comments (Optional)	

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

--

☒ Manager Signature & Release to Employee

Date: 01/20/2014

☒ Employee Signature

Date: 01/21/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

District Averages Mid Year:

Prints Issued 136

Hours Issued 6503

ODN HH 97

NWC HH 223

Average of Fac_Verification 18.2%

Average of SRs 25

The above numbers give you an idea of the measureables. The item that is the hottest for the remainder of the year is Facility Verifications completed within 8 days. You have solid experience, you just need to continue to learn the Engineering systems and process flows.

I like that you are asking questions and are taking advantage of other Engineers to gain experience.

Employee Comments (Optional)

--

☒ Manager Signature & Release to Employee

Date: 08/14/2014

☒ Employee Signature

Date: 08/14/2014

Section 4 - Year End Review**Status:** Completed**Period:** January 1 - December 31**Manager Performance Summary**

Your Average of Fac_Verification 5.4* vs 12.7 Team's Average
 Your # of SRs 20* vs 57 Team's Average

Dave completed six months in Engineering and was focused on HBW and driving down the Facility Verification Interval, which he succeeded in achieving the metric of <8. This was a notable achievement and was a positive contribution to the Team. Dave also made solid progress on learning the systems and flow of

Engineering. Dave must keep an open dialogue with myself, his Teammates and our staff to ensure that he continues down a positive path.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/24/2015

☒ Employee Signature

Date: 02/24/2015**Section 5 - Performance Rating**

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>

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Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: **Performing**

Signatures :

Employee : David Perry

Date: 2015-02-24

Manager : Brian Magee

Date: 2015-02-24

Exhibit GG

2014 Performance

2014 - Year-End Performance Review

Employee: Anthony S Portolese , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Supervisor Responsibilities

- Description and Measures:

As a Verizon leader, drive business results by building and developing a strong diverse team and

maximizing team performance. Specific measures include:

1. Setting and communicating objectives and priorities and providing ongoing direction
2. Completing all required performance documents and conducting associated performance discussions (performance agreement/objectives, mid-year review, year-end review) by required deadlines
3. Providing ongoing performance feedback, coaching, training and development
4. Taking appropriate performance improvement action, or administering appropriate discipline when employees do not meet performance standards or expectations
5. Ensuring a safe and ethical work environment by complying with the Code of Conduct and all Company policies

- Employee Accomplishments / Status:

1/1-14-5/24/14

C&X Supervisor

Performance agreements and objectives were created and covered with all of my team in the January timeframe. Since then I have continually communicated the expectations. I have met all midyear coverage expectations. I have conducted monthly safety meetings, inspections, coaching and technical training as necessary. I hold my team accountable to the results and expectations and addresses issues

swiftly and appropriately.

5/25/14-Current

OSP Engineer

-Responsible for Conduit/Highway OSP Engineering for the City of Philadelphia.

-Responsible for all 3rd Party Lease Requests in the City of Philadelphia

-Responsible to review all GPIS Permit requests from other utility companies in the City of Philadelphia

-Serve as the Verizon point of contact for the Committee of Highway Supervisors in the City of Philadelphia.

Manager Comments (Optional)

Living by the Credo

- Description and Measures: Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status: Worked with team and provided coaching to improve productivity numbers. Productivity has shown improvement from beginning of year.

-Serve as subject matter expert for Philadelphia Engineering team in ICGS, IDDS, IVAPP, NTAS, & BDMS.

-Help to facilitate team in conduit, FTTP, and HBW design.

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance flos to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro

Network Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status: Designed & Issued 60 conduit EWOs to facilitate HBW Orders, FTTP, and BAU work.

Manager Comments (Optional)

Be More Profitable

- Description and Measures:

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)

Total Budget Performance Core

Total Budget Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense

Spend

Energy Reduction

Retirements (\$M)

Cost of Removal

- **Employee Accomplishments / Status:** Work with other Engineers to limit job cost by finding alternatives to replacing conduit. This is done by redesigning EWOs and cable paths to limit the cost of new conduit installation.

Manager Comments (Optional)

Simplify Processes

- **Description and Measures:** Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

<p>Incorporate a CWS experiment.</p> <p>Drive change and innovation that brings results to the bottom line.</p> <p>Achieve WIG Objective</p> <p>Implement 4 DX initiative</p> <p>Reduce CIP %</p> <p>Reduce work order variance %</p> <p>- Employee Accomplishments / Status:-Processed 65 3rd Party lease request. -Review 180 GPIS Permit requests for other utilities. -Issue 60 conduit EWOs.</p> <p>Manager Comments (Optional)</p>
--

<p>Fuel Our Culture</p> <p>- Description and Measures:Employee Development - job related training-complete minimum (2) training sessions</p> <p>• Complete (2) training courses</p> <p>Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents</p> <p>Absence (%)</p> <p>• Individual Absence Ratio <1%</p> <p>- Employee Accomplishments / Status:-Completed 10 VZ Learn Courses.</p> <p>Manager Comments (Optional)</p>
--

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

I will use my leadership ability to generate meaningful impact and progress that has a direct correlation to our revenue growth and overall customer experience. My focus will be in the following areas:
Key Priorities

Deliver a Great Customer Experience

Grow Customers and Revenue

Drive Profitability Higher

By meeting or exceeding the following measures:

CXM_COPPER PRS JOINED PER HR GOAL 32.03

CXM_COPPER PRS RECON REWIR

PER HR GOAL 1.83

CXM_COPPER TRANSFER PER HR GOAL 7.53

CXM_COPPER TRIMOUT PER HR GOAL 27.12

CXM_DRAKA PLACEMENT RATE GOAL 13.68

CXM_FDT TAIL FT PER HR GOAL 85.49

CXM_FIBER FDT SPLICED PER HR GOAL 3.72

CXM_FIBERS JOINED PER HR GOAL 6.71

CXM_FIBER TRIM OUT PER HR GOAL 5.41

CXM_HRS PER FDH PLACED GOAL 7.91

CXM_HRS PER FDT PEND SPLICE TEST GOAL 8.93

CXM_HRS PER FDT PLACED

GOAL 3.55

CXM_HRS PER POLE PLACED GOAL 21.92

CXM_HRS PER POLE REMOVED GOAL 6.9

CXM_LP ELEC CABS PLACE PER HR GOAL 0.08

CXM_LP ELEC PLACED PER HR GOAL 0.67

CXM_LP ELEC REMOVED PER HR GOAL 3.3

CXM_LP ELEC TURNUP PER HR GOAL 0.09

CXM_M3 ONEPASS PLACEMENT RATE GOAL 12

CXM_SHEAT FT PER HR COPPER PL OR XFER GOAL 12.63

CXM_SHEATH FT PER HR COPPER REMOVED GOAL 30.35

CXM_SHEATH

FT PER HR FIBER PL OR XFER GOAL 42.9

CXM_SHEATH FT PER HR FIBER REMOVED GOAL 75.56

CXM_ECCD Met Overall Goal 93

Build our Culture

QUALITY INSPECTION GOAL 1 per tech/month

COACHING SESSION GOAL 1 per tech/month

SAFETY MEETING GOAL 1 per tech/month

SAFETY WO GOAL 2 per tech/month

LOST DAY RATE GOAL 1.77

MV INC RATE GOAL 4.03

OSHA INJ RATE GOAL 3.67

Employee Comments (Optional)

CONFIDENTIAL

VZ_WALKER_285

☒ Manager Signature & Release to Employee

Date: 02/05/2014

☒ Employee Signature

Date: 02/06/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

Anthony settled into his new role of Conduit Engineer during the 2nd Quarter. Anthony possess the skills and education to perform the functions of the position. In 2nd half give extra priority to any conduit issues involving HBW orders.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/14/2014

☒ Employee Signature

Date: 08/14/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Anthony will expanded his knowledge of OSP Engineering with his assignment to the Conduit Role in Philadelphia. His education, experience and decision making ability are all put into practice in this position. He made solid ground in learning the new role and the processes/systems associated with the permits and 3rd Party. He also made a major impact on the design of "18th St relocation" which protected Verizon's interest and satisfied the Developer's needs.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/25/2015

☒ Employee Signature

Date: 02/25/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating:**Performing**

Signatures :

Employee : Anthony Portolese

Date: 2015-02-25

Manager : Brian Magee

Date: 2015-02-25

Exhibit HH

2014 Performance

2014 - Year-End Performance Review

Employee: Edward T Boudman , Engr III Spec-Ntwk Eng&Ops
Manager: Carl Gross, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- **Description and Measures:** Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

- Employee Accomplishments / Status:

For 2014 I 'lived the credo' by staying customer focused, working and living with integrity, working as a team with my Verizon counterparts, and developing my knowledge both personally and professionally to bring my best performance to work on a daily basis.

I especially met this goal as I took on the responsibility of the Allentown and Mountainville central office areas for half of the year due to retirements on our

team. My counterparts and I worked and continue to work as a team to help each other through the additional workload and the hurdles of learning a new area.

Manager Comments (Optional)**Grow Revenue****- Description and Measures:**

Meet/exceed network expansion and facility build targets.

Support new products and global product expansion.

Drive products on-net.

Accelerate speed to market and service delivery intervals.

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to the Cell Site

Site Survey

EWOs Issued

FTTC E2E Macro Network

Build

FTTC E2E Micro (Small Cell) Build

VzW Backbone Network Upgrades

Total Prems Passed Incr

Total Prems Open for Sale Incr

MXU Open for Sale Incr

MTU Open For Sales

- Employee Accomplishments / Status:

See attached scorecard and hbw results.

For 2014 I helped my team significantly reduce our high bandwidth service delivery by answering SRs and getting the work orders out to construction as quickly as possible. I worked with my counterparts at AT&T and Verizon Wireless to deliver my FTTCs work prints to CXM on target. I was able to refer several MDU/MTU opportunities to expand the network and I satisfied the FiOS

held orders that came across my desk in a timely manner to avoid service delays.

As residential developments continued to grow in 2014. I worked with my counterparts and the builders in my area to ensure my prints were issued in a timely manner to allow construction enough time to complete their work to avoid held orders.

- 337 total EWO's issued in 2014

Manager Comments (Optional)

Be more profitable**- Description and Measures:**

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.
 Consolidate systems, operations and facilities.
 Increase productivity by simplifying, standardizing and automating processes.
 Drive network convergence to improve capex and opex efficiency.
 Cut energy, fuel and paper consumption to reduce costs and environmental impact.
 Network Engr Capital (\$M)
 Total Budget Performance Core
 Total Budget

Performance FTTP (w/out PC, with Video)
 Total Budget VZB
 FTTCs Capital (\$M)
 FTTCs \$ per site (6-month rolling avg cost) (000)
 Core Unit Costs
 DS1
 DS3
 OC-N
 FTTP Unit Costs
 12-mo Rolling \$ Cost Per Prem Passed
 12-mo Rolling \$ Cost Per MDU NC
 12-mo Rolling \$ Cost Per MTU NC
 Standard \$ Cost Per Prem Passed
 Standard \$ Cost Per MDU NC
 Network Reliability
 Capital Spend
 Expense Spend
 Network Engineering Mgmt Headcount
 (FTE)
 Energy Reduction
 Retirements (\$M)
 Cost of Removal

- Employee Accomplishments / Status:Ongoing.

To meet these objectives I continued to work 'paperless' as much as possible to reduce consumption and capital costs. I looked for ways to provide fiber solutions versus copper service whenever possible, and I used 'adaptive engineering' to put the right job at the best cost out to construction.

Manager Comments (Optional)**Improve the customer experience****- Description and Measures:**

- Employee Accomplishments / Status:To improve my customers' experience I returned all voice and e-mails in timely manner. I treated all customers, both internal and external, the way I would like to be treated as a customer, and I followed up and made sure I delivered on any commitments I made.

Manager Comments (Optional)**Simplify Products, Policies, and Processes**

- Description and Measures:Get the job done the right way.
Be accountable for results, adhere to our core values and operate with a sense of urgency.
Incorporate a CWS experiment.
Drive change and innovation that brings results to the bottom line.
100% Implementation of (IOF) EPM
Achieve WIG Objective
Implement 4 DX initiative
Reduce CIP %
Reduce work order variance %

- Employee Accomplishments / Status:participates in weekly WIG huddles, providing results and knows objective of achieving reductions in facility verifications.

Manager Comments (Optional)**Fuel our culture**

- Description and Measures:Employee Development - job related training-complete minimum (2) training sessions
• Complete (2) training courses
Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents
Absence (%)
• % Management Absence
• Individual Absence Ratio <1%
Recognition

- Employee Accomplishments / Status:In 2014 I had zero motor vehicle accidents and zero medical absence. I completed my training as needed.

Manager Comments (Optional)**District Objectives**

- Description and Measures:Meet all Chapter 30 requirements
Chapter 30 - Budget
C30 -BFRR - Regulatory On-Time
C30 - 2014 Regulatory Target

- Employee Accomplishments / Status:ongoing.

Manager Comments (Optional)

Network Reliability

- Description and Measures: IIP

Chronic DS-1

E911 Network Diversity

SS7 Network Diversity

- Employee Accomplishments / Status: To meet my objectives for Network Reliability in 2014 I ensured that I released any IIP jobs that came across my desk ASAP and I looked for fiber solutions whenever possible for the chronic DS1's in my areas.

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)



Manager Signature & Release to Employee

Date: 02/26/2014



Employee Signature

Date: 02/27/2014

CONFIDENTIAL

VZ/WALKER 873

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

Ed engineers the Pottstown sub district for all BAU activities. Ed also picked up 2 additional wire centers in the Allentown sub district because of early retirements of 2 engineers.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/12/2014

☒ Employee Signature

Date: 08/13/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Ed has the responsibility for the Pottstown sub district for 360 engineering. In addition to that area Ed also picked up 2 additional wire centers in the Lehigh valley for the beginning of the year because of some employee retirements. Ed is self motivated and does a great job at communicating his efforts to both construction and his peers. Although I get few escalation's in his area, when they do come up, Ed

addresses them with a sense of urgency and follow them through till they are completed. Ed had a relatively low volume of Sr's compared to the rest of the team but is a reflection of the area that he engineers in and has more of the whirl wind issues that go along with that area. One area I would like to see Ed improve on in the coming year is to increase his percentage of jobs issued within 8 days of

application. His percentage this year was at 31%, putting him in the bottom third of our district.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/17/2015

☒ Employee Signature

Date: 02/17/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<p><i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i></p> <ul style="list-style-type: none"> - New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee. - Performing duties less than 3 months of the year due to an authorized absence or leave.

Performance Rating: **Performing**

Signatures :

Employee : Edward Boudman Date: 2015-02-17

Manager : Carl Gross Date: 2015-02-17

Exhibit II

2014 Performance

2014 - Year-End Performance Review

Employee: Paul J Mulhern III, Engr III Spec-Ntwk Eng&Ops
Manager: Carl Gross, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- **Description and Measures:** Model the Credo in our daily work by demonstrating integrity, customer focus, sense of urgency, personal accountability, teamwork, and by complying with the Code of Conduct.

• **Employee Accomplishments / Status:** Completion Notification for 2014 Antitrust Law.
 Completion Notification for CPNI Annual Training 2014-2015.
 Mandatory CPNI Consent Decree Training due Nov. 26, 2014.
 RequestNet Release 17.6 Confirming Date and time.
 Suttle Product Review and Demonstration.
 Pennsylvania User Meeting Confirmation.
 Assist CXM & Cops on cable damages.

Manager Comments (Optional)

Grow Revenue

- Description and Measures:

Meet/exceed network expansion and facility build targets.
 Support new products and global product expansion.
 Drive products on-net.
 Accelerate speed to market and service delivery intervals.
 Optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.
 Fiber to the Cell Site
 Site Survey
 EWOs Issued
 FTTC E2E Macro Network
 Build
 FTTC E2E Micro (Small Cell) Build
 VzW Backbone Network Upgrades
 Total Prems Passed Incr
 Total Prems Open for Sale Incr
 MXU Open for Sale Incr
 MTU Open For Sales

• **Employee Accomplishments / Status:** See attached spreadsheet that includes all scorecard data as well as individual results.
 EWOs issued = 268+
 #ODN HH = 217+
 #NWC HH = 575+

Manager Comments (Optional)

Be more profitable

- Description and Measures:

Aggressively control and reduce all operating and capital costs, meeting 2014 budget commitments.
 Consolidate systems, operations and facilities.
 Increase productivity by simplifying, standardizing and automating processes.
 Drive network convergence to improve capex and opex efficiency.
 Cut energy, fuel and paper consumption to reduce costs and environmental impact.

Network Engr Capital (\$M)
 Total Budget Performance Core
 Total Budget

Performance FTTP (w/out PC, with Video)

Total Budget VZB

FTTCS Capital (\$M)

FTTCS \$ per site (6-month rolling avg cost) (000)

Core Unit Costs

DS1

DS3

OC-N

FTTP Unit Costs

12-mo Rolling \$ Cost Per Prem Passed

12-mo Rolling \$ Cost Per MDU NC

12-mo Rolling \$ Cost Per MTU NC

Standard \$ Cost Per Prem Passed

Standard \$ Cost Per MDU NC

Network Reliability

Capital Spend

Expense Spend

Network Engineering Mgmt Headcount

(FTE)

Energy Reduction

Retirements (\$M)

Cost of Removal

- Employee Accomplishments / Status: Ongoing and in progress.

Manager Comments (Optional)

Improve the customer experience

- Description and Measures:

- Employee Accomplishments / Status:

Manager Comments (Optional)

Simplify Products, Policies, and Processes

- Description and Measures: Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment.

Drive change and innovation that brings results to the bottom line.

100% Implementation of (IOF) EPM

Achieve WIG Objective

Implement 4 DX initiative

Reduce CIP %

Reduce work order variance %

- **Employee Accomplishments / Status:**Message From Congressman Jim Gerlach.
Response from Senator Casey

Manager Comments (Optional)

Fuel our culture

- **Description and Measures:**Safety-Motor Vehicle Accidents Objective - Zero Motor Vehicle Accidents
Absence (%)

- % Management Absence
 - Individual Absence Ratio <1%
- Recognition

- **Employee Accomplishments / Status:**Completed 188A testing.
Completion Notification for Driver Safety Series - Changing Lanes.
Completion Notification for Driver Safety Series - Slow Down and Live.
Completion Notification for Driver Safety Series- Do Not Be a Tailgater.
Completion Notification for Driver Safety Series- Safe Intersection Techniques.
CPR Class.
Incident Investigation for Case VM0000064545 (non-chargeable mv incident).
0 absence -- I think my last sick day was over 20 years ago.

Manager Comments (Optional)

District Objectives

- **Description and Measures:**Meet all Chapter 30 requirements

Chapter 30 - Budget
C30 -BFRR - Regulatory On-Time
C30 - 2014 Regulatory Target

- **Employee Accomplishments / Status:**Ongoing and providing support when required.

Manager Comments (Optional)

Network Reliability

- **Description and Measures:**ILP

Chronic DS-1
E911 Network Diversity
SS7 Network Diversity

- Employee Accomplishments / Status:Ongoing and providing support when required.

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/26/2014

☒ Employee Signature

Date: 02/26/2014

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

Paul does 360 engineering for the West Chester sub district, with paying special attention to all HBW services. Paul works hard to complete the facility verification piece within our 8 day target and is driving the customer ready date to get the service in as soon as possible.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/13/2014

☒ Employee Signature

Date: 08/14/2014

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Paul has responsibility for 360 degree engineering in the West Chester area, encompassing 4 wire centers. Paul's main focus is the reduction of the overall interval for all high bandwidth services while keeping control of the whirlwind that he deals with every day. Paul does a good job of communicating with his construction peers as well as keeping me informed of situations that are cause for concern. Paul does a good

job of meeting all the metric's that we have in place but one area that I need Paul to improve on is his 8 day facility verification objective that is in place. Paul's percentage for doing this is at 25% which is the 3rd lowest in the district. His overall average for facility verification is at 9 days, so with a concerted effort, am sure that he can drive his percentage up into the 50% range. I attached my copy of scorecard for the group's overall achievements. Paul's biggest contribution for 2015 would be to work through any road blocks and get the jobs issued within 8 days where possible.

Employee Comments (Optional)

--

☒ Manager Signature & Release to Employee

Date: 02/18/2015

☒ Employee Signature

Date: 02/18/2015

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Performing

Signatures :

Employee : Paul Mulhern

Date: 2015-02-18

Manager : Carl Gross

Date: 2015-02-18

Exhibit JJ

2013 Performance

2013 - Year-End Performance Review

Employee: Samuel J Capizzi , Engr III Spec-Ntwk Eng&Ops
Manager: Carl Gross, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work including by demonstrating integrity, customer focus, sense of urgency, personal accountability, and teamwork, and by complying with the Business Code of Conduct.

- Employee Accomplishments / Status:

Demonstrates the Credo daily in work ethic. Displays a sense of urgency with no misses in 2013 on Hi Cap orders. Takes personal accountability on a personal level by assuring all contractor prints returned to VZ Engineering are accurate and uphold the Verizon standard before issuing work to Construction. Sam complies fully with the Business Code of Conduit completing all mandatory online requirements yearly. Finally

this Engineer is wholly focused on the customer demand - going beyond when necessary to meet customer due dates on work required.

Manager Comments (Optional)

Sam lives by the credo by focusing outward on our customers everyday. Sam engineers a sub district that is loaded with high revenue, high value customers and does what is necessary to keep the orders moving. Because of the volume of orders that Sam deals with, he will be a key component in reaching our biggest target of the year which is reducing intervals. I rely on Sam because of his extensive OSP background and

the ability to process work as quickly as he does. Now we have to take that knowledge and figure out a way to do it even quicker.

Accelerate Revenue Growth

- Description and Measures: Meet/exceed network expansion and facility build targets.

-SFU Greenfields

-MDU/MTU Overlays

-MDU/MTU Greenfields

Accelerate speed to market and service delivery intervals.

- Employee Accomplishments / Status:

* Actively participated in FAST inquires effectively qualifying as close to 100% of properties as possible.

* Engineer issued hi cap work orders in certain cases where customer requirements were not completely built but were promised thereby accelerating income.

* Project managed/designed total of 197 work authorities in 2013 including 101 Hi Cap orders such as DS3, TLS, VzON & OC3 level services.

* This included issuing 20

Chapter 63 work orders as well as, MxU, Digital, Billable & Service Orders

Manager Comments (Optional)

Sam moves on all his hi cap work and FIOS builds because he knows the revenue at stake. He does what is necessary to keep the orders moving, but does not get any breaks because it seems as fast as he answers one, several more keep coming his way. Sam utilizes contractors as much as possible to gets the jobs issued, therefore bringing in the revenue as soon as possible.

Support new products and global product expansion**- Description and Measures:FTTCS**

MXU new products

Know products and be able to explain them to our customers

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth.

Enhance FIOS to provide converged communication, information and entertainment services.

- Employee Accomplishments / Status:

Engineer took advantage of using new products in the deployment of Hi Cap orders such as the newly released Adtran OPTI-6100 MUX for customers with Ethernet requirements.

Effectively gets prints out in a timely manner to insure construction has enough time to complete in advance of the service order.

Monitors our held order buckets for respective central office's and makes sure there is a solution prior to the

date due to keep customer satisfaction at a high level.

In responding to FAST inquiries, assures that the addresses that validate are good and can be worked, avoiding customer disappointments down the road.

Actively pursued new products in FIOS and Digital

Manager Comments (Optional)

Sam works well with his other HBW engineers in deploying the latest and greatest technologies that are available to us, giving our customers the advantage that our fiber networks allow.

Increase Profit Margin**- Description and Measures:-Capital Budget**

-Expense Budget

-Estimate Administration

-Routine Work Administration

-CWO Administration

Aggressively control and reduce all operating and capital costs, meeting 2013 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Cut energy, fuel and paper consumption to reduce costs and environmental impacts.

- Employee Accomplishments / Status:

* Managed Design Work for 5 C.O.s n LNLX & NRTW which included MDU/MTU Greenfield design and Overlays as well as digital. Ability to grasp new function of being 360 Engineer is impeccable.

* Engineer had no unrecoverable money on CWO's. Managed to collect 100% on all billable jobs thereby eliminating the need to expense uncollectable spending on CWO's.

* Met 0 Late supplements requirement with no Estimates requiring supplements

* Designed and managed design contractors to succeed in 100% ICGS work order design

* Designed and/or project managed 101 hi cap work orders - this includes TLS, VzON, OC3 & DS3 orders that have very strict time frames. Maintained a 0 miss productivity in high cap orders.

Manager Comments (Optional)

Sam scrutinizes all his jobs to make sure they are right, fall within budget and will meet customers expectations.

Leverage Best Network and Improve Customer Service

- **Description and Measures:** Standard Interval Compliance – 99%

Prints Issued On Time – 99%

Pre-RID as % Total Pre-RID Pending - 95%

Requestnet Intervals - Firm Orders FOC

-%72 hrs (DS3,OCn & Ethernet) - 95%

-%24 hrs (DS1) – 95%

Improve network availability.

Meet ECCD objectives

Improve quality across all internal and external customer services.

- Employee Accomplishments / Status:

•Held orders- Contributed to the reduction of Norristown and Line Lexington held orders by working diligently with builders and developers to issue work orders in advance of service orders.

* Responsible for DSO coordination and DS3 and above and answers all pending orders in vBuild and Request Net to assure orders are able to flow through accurately. This included 0 orders exceeding Engineering allowance of 72 hours held

without response on hi cap orders.

* Handles FAST inquiries in absence of regular coordinator and Express Firm and Firm Express TLS orders for VZB

Manager Comments (Optional)

Sam does whatever is possible to position our customers on our fiber network. He is active in deploying multiplexers to the end user, giving them the best quality and best equipment available to maximize the fiber networks that we all know is the best in the world.

Leverage technology to deliver network and services reliable

- Description and Measures: Apply a customer - first - attitude to all transactions, products and services.
 Improve network availability.
 Meet ECCD objectives.
 Improve teamwork across all internal and external customer services.

- Employee Accomplishments / Status:

• Held orders- both DSO and Hi Cap. Contributed to the reduction of both types of held orders by working diligently with builders and developers as well as customers and vendors, issue work orders in advance of service orders and in a timely fashion if in response to service order.

* Responsible for DSO coordination and answers all pending orders in vBuild to assure orders are able to flow through accurately.

*

Handles FAST inquiries in absence of regular coordinator.

* Reviews old work with Planning/ Construction to determine relevance of old routines. Assists in removing roadblock s prohibiting completion of estimates (i.e. releases, issue 2s..)

* Meets frequently with customers to determine their service needs and time requirements. Designs jobs in order to meet those requirements. Monitors work with construction and frequently visits job sites to check on progress of new developments with builders promoting loyalty to Verizon.

* Works with CMC in order to assure cable and job materials are ordered and job is scheduled for on-time completion and escalates to Manager when necessary.

* Communicates daily with all Engineering disciplines such as Planning, Right of Way, and Drafting in order to project manage internal flow of work.

Manager Comments (Optional)

Sam stays engaged with our customers, keeping them informed and up to date on their expectations. Sam knows that the quicker we provision the orders, the customers are happy, and Verizon benefits by bringing in the cash sooner.

Create a Culture of Performance

- Description and Measures: Get the job done the right way.
 Be accountable for results, adhere to our core values and operate with a sense of urgency.

Drive change and innovation that brings results to the bottom line.

Complete training has required

Effective communications using email, websites, staff meetings and site visits.

Meet all human resource deliverable timelines

meet al compliance initiatives.

- Employee Accomplishments / Status:

- * Designs work exclusively in ICGS

- * Reviews job pricing for accuracy. Works with Construction forces to determine the amount of labor required and makes necessary adjustments prior to billing customer in order to alleviate need for additional billing upon job completion. Details scope of job, requirements and cost to customer through detailed billing letters and on site job visits. Collects funding prior to issuing work order

and adheres to all CWO processes. Works with Construction Management Center and Contractors directly to facilitate completion of work for CWO customers

- * Designed/Project Managed 197 total engineering work orders in 2013. This included 101 Hi Cap orders and 20 Chapter 63 orders as well as 12 CWO's.

- * Completed all supplements on time factoring in work in progress and securing appropriate capital to complete estimate.

- *

Adheres to all CWO guidelines and processes. Works diligently to collect reimbursable funds from customers by detailing work to be completed and cost in billing letter and through on site visits.

Manager Comments (Optional)

I have received several compliments from Sam's construction counterparts. They all like the jobs that he delivers and feels confident they can be built the way they were designed.

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/05/2013

☒ Employee Signature

Date: 02/08/2013

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

Sam does an outstanding job in managing his 5 active central offices. Sam took on the responsibility of 360 degree engineering in one of the most active areas in my district and managed to do it without missing any objectives. Sam is extremely knowledgeable with respect to all parts of outside plant and is one of the main go to guys that we have in the district. I continue to rely on Sam as a resource of knowledge and know that when I go to him, will get the right answer.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/05/2013

☒ Employee Signature

Date: 08/05/2013

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Sam engineers a very busy, high revenue district and does it well. I know he continues to have the most SR's in the group that need to be worked and want to challenge him to drive the number down and shorten our intervals. I would like to see him work with Dave Dehaven, and Ken Wojton on ways to process the orders quicker, get the jobs issued sooner and shorten overall intervals to align with our biggest objective given to us this year.

Employee Comments (Optional)
☒ Manager Signature & Release to Employee

Date: 02/17/2014

☒ Employee Signature

Date: 02/18/2014

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position. - New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted</i>

	<i>employee. - Performing duties less than 3 months of the year due to an authorized absence or leave.</i>
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Performance Rating:**Performing**

Signatures :

Employee : Samuel Capizzi Date: 2014-02-18

Manager : Carl Gross Date: 2014-02-17

Exhibit KK

2013 Performance

2013 - Year-End Performance Review

Employee: David T Dehaven , Engr III Spec-Ntwk Eng&Ops
Manager: Carl Gross, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work including by demonstrating integrity, customer focus, sense of urgency, personal accountability, and teamwork, and by complying with the Business Code of Conduct.

- Employee Accomplishments / Status:

During 2013 Dave has modeled Verizon's Credo by focusing on the customer's needs and ensuring their requests are met. Dave has processed 145 SR's and has met each ECCD date on the orders. Dave works each SR in a timely manner attempting to issue work orders well before the to be issued date allowing construction ample time to complete the work order. The meeting of the ECCD displays Dave's sense of urgency and

personal accountability in striving to meet the organizations and customer needs.

In order to meet the expectations of the customer Dave uses teamwork engaging all organizations throughout Verizon to complete the work. Often SR's require the coordination of sales, BRCC, customer contact, construction and system techs to make certain all parties are aware of the work required to complete the SR on time. Dave also

continually communicates with the customer to make certain their EUCR are complete and ready for installation. The constant communication ensures Verizon metrics and the customer's needs are met.

Dave has also worked to satisfy all BAU and FIOS customers including CWO, MDU, MTU, buried developments, pole work and copper services following the credo in each of the aforementioned instances to aid in satisfying the various

aspect of Verizon's customer base.

Manager Comments (Optional)

Dave models our credo every day by recognizing the importance of our customers and always puts them first.

Dave does his best to deliver to our customers what they want, when they want them, always keeping budgets in mind. Dave has processed the most SR's on my team and continues to stay focused on all deliverables.

Accelerate Revenue Growth

- Description and Measures: Meet/exceed network expansion and facility build targets.

-SFU Greenfields

-MDU/MTU Overlays

-MDU/MTU Greenfields

Accelerate speed to market and service delivery intervals.

- Employee Accomplishments / Status:

Dave has met all deadlines and objectives for SFU and MXU projects. Dave has worked on each job interfacing with the customers, Marketing, Sales, contractors and construction to make certain each job has exceeded the metrics set for 2013. Dave continually attempts to complete all preliminary work such as road crossings, inside path creation and inner duct/conduit placement in a timely manner to make certain the job is

ready for construction when the job is approved. The ability to complete the preliminary work enables construction to complete the work within their allotted timeframe. Dave's ability to complete each job within the allocated time frame ensures Verizon's customers can order the desired services allowing revenue and profits to increase.

Dave's ability to work with each organization during the mxu process has enabled Verizon to provide FIOS service to an additional 110 customer's at various properties throughout his turf.

Manager Comments (Optional)

Dave has issued in excess of 120 high bandwidth orders for 2013. He has the highest in the district for 360 engineers. He continues to look for ways to improve the cycle time for all service requests, while still keeping standard intervals in mind. Dave also understands the importance of delivering our products and services on our fiber platform, while trying to eliminate or migrate copper based services. By doing

this, he delivers to the customer the best possible product that Verizon can offer, on the most reliable network.

Support new products and global product expansion**- Description and Measures:FTTCS**

MXU new products

Know products and be able to explain them to our customers

Optimize broadband capabilities to stay ahead of increasing demand for bandwidth.

Enhance FIOS to provide converged communication, information and entertainment services.

- Employee Accomplishments / Status:

Dave has worked with each customer throughout 2013 to ensure not only their current needs are met but also discusses the possibility of future bandwidth demands. Dave analyzes the information and implements a plan to make certain all future needs of the customer are met using a cost effective installation methods such as placing multiplexers in controlled environment vaults minimizing fiber usage allowing a large serving area

to be provided high bandwidth service. The multiplexer installation is both beneficial to Verizon and the customer by decreasing future expense and providing superior service to each customer.

Dave has also worked to meet the demands of the FTTCS project including providing high bandwidth service to cell sites, meeting the metrics and timeframe set for the each project. Dave has engaged construction teams and contractors

to make certain the job will be complete on time allowing the future and current needs of Verizon wireless and other cell site carriers to be met.

Manager Comments (Optional)

Dave takes a hard look at all SR's that are processed and always takes into account the big picture. If he sees additional opportunities for services, he allows for short term growth to maximize on Verizon's investment. This allows for more flow through operations, better service to our customers and best costs to Verizon.

Increase Profit Margin**- Description and Measures:-Capital Budget**

-Expense Budget

-Estimate Administration

-Routine Work Administration

-CWO Administration

Aggressively control and reduce all operating and capital costs, meeting 2013 budget commitments.

Consolidate systems, operations and facilities.

Increase productivity by simplifying, standardizing and automating processes.

Cut energy, fuel and paper consumption to reduce costs and environmental impacts.

- Employee Accomplishments / Status:

Dave reviews each job to make certain the work order is cost effective and written to provide optimal service at minimal cost. Dave is always cognizant of the effects each work order has on expense and evaluates alternatives to ensure cost is minimal while potential revenue and profits are maximized. Furthermore, Dave has worked to ensure he has zero late supplements. The ability to monitor each estimate and make

certain the job spends within the set cost parameters allows Verizon to reduce cost.

Dave has also made an effort to reduce cost by utilizing best practices such as using contractors when possible. The effective use of contractors greatly reduces the overall cost of each work order. When possible, Dave has also reduced the use of paper by creating online folders for each job. Moreover, Dave has written numerous stc

power down and plug removal jobs to enable Verizon to reduce energy costs. The reduction in energy cost will allow Verizon to realize reduced expenses and increased profit margins. Additionally, the power down initiative has reduced Verizon's environmental impact.

Manager Comments (Optional)

Since Dave processed the most SR's for my team, and the district, he has the best opportunity for growing revenue and increasing profit margin's. Best way to do this is to capitalize on our investment to get the most out of what we install. He is always thinking long term and doing the right job up front to minimize expenditures on the back end. This is better for the customer and Verizon as it speeds delivery of service while keeping costs at a minimum.

Leverage Best Network and Improve Customer Service**- Description and Measures: Standard Interval Compliance – 99%**

Prints Issued On Time – 99%

Pre-RID as % Total Pre-RID Pending - 95%

Requestnet Intervals - Firm Orders FOC

-%72 hrs (DS3, OCn & Ethernet) - 95%

-%24 hrs (DS1) – 95%

Improve network availability.

Meet ECCD objectives

Improve quality across all internal and external customer services.

- Employee Accomplishments / Status:

During 2013 Dave has worked 145 high bandwidth orders. Dave is 100% compliant in meeting the metrics of standard interval compliance, prints issued on time and meeting RID dates on all high bandwidth orders. Furthermore, Dave has met all FOC dates on each of the orders issued to construction. Dave has worked with construction and contract services to make certain each job is completed within the allotted

timeframe.

Dave has also worked with the planning team on each of the high bandwidth orders to not only satisfy the existing request but to perform an in depth analysis of the projected future high bandwidth needs of the particular serving area. In several instances a decision was made to place a next generation mux in the CEV to save future capital dollars. The decision to place the multiplexer enables future

customers in the serving area to be provided service at minimal cost to Verizon. Additionally, in 2013 an initiative between Engineering and IOF using the 9500 in the central offices to provide TLS service throughout the serving area has greatly reduced fiber usage between offices. The use of multiplexers to gain access to TLS switches reduces the need for costly fibers work orders. The decision has enabled Verizon to

reduce expense and make certain the customer obtains the desired services in a timely manner. The use of IOF multiplexers greatly reduces the build interval generating revenue in a shorter time frame. Additionally, the decision to use IOF and CEV multiplexers will aid in meeting future ECCD objectives and improve network quality and availability in the particular serving area.

Manager Comments (Optional)

Dave recognizes the importance of Verizon's fiber network and does whatever is required to get our customers on it. Whenever possible, Dave looks for opportunity to migrate our customers off copper onto our fiber network, which is the most reliable network in the country.. This keeps our customers happy and willing to stay on our network.

Leverage technology to deliver network and services reliable

- Description and Measures: Apply a customer - first - attitude to all transactions, products and services.

Improve network availability.

Meet ECCD objectives.

Improve teamwork across all internal and external customer services.

- Employee Accomplishments / Status:

Dave has met all ECCD objectives throughout 2013. Dave has made certain all prints and preliminary work is complete before the work orders to be issued date ensuring customers obtain the service by the set FOC date. Dave has attempted to issue work orders before the to be issued date allowing Verizon's construction team to begin construction allowing for the early completion of many issued work orders. The early

completion often leads to early turn up of CKTS and increases customer satisfaction.

Dave has continually focused to work with internal and external stakeholders to ensure all metrics are met allowing increases in profits and revenue. Additionally, the ability to orchestrate teamwork between various organizations enables the construction team to turn up the equipment before ECCD and improve the network availability to

several customers in the surrounding serving area. Customer satisfaction is Dave's top goal. Dave's ability to work with the customer and all parties needed to complete each service request guarantees each customer is satisfied when the work is complete.

Manager Comments (Optional)

Dave operates in wire centers that have been overlaid with FIOS. Dave takes this into consideration on every service order that he works with. Where he can deliver the requests on fiber, that is always first choice. In addition, where he can migrate the customer off of copper, he does that as well. Dave recognizes that once we get the last mile to the customer on fiber, provisioning going forward is much easier and quicker.

Create a Culture of Performance**- Description and Measures:** Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Drive change and innovation that brings results to the bottom line.

Complete training has required

Effective communications using email, websites, staff meetings and site visits.

Meet all human resource deliverable timelines

meet all compliance initiatives.

- Employee Accomplishments / Status:

Dave has worked to complete each job in a cost efficient manner while ensuring the future needs of the surrounding serving area will be met. Dave has implemented changes such as beginning to place multiplexers for high bandwidth TLS job in CEV's and working with IOF to make use of multiplexers in the IOF network. The usage of the multiplexer network allows future TLS orders and other high bandwidth requests to be

flowed through the request system greatly reducing the CKT delivery date. Additionally, the usage of the multiplexers aids in reducing the standard interval date and allows CKTs to be turned up quickly. The reduction in TLS intervals enables Verizon to increase revenue and decrease expense by reducing the overall cost of the build.

Dave has completed all necessary training modules including building shareholder value, keys

for safeguarding privacy and confidential information, driver safety how to avoid becoming distracted driver, network survivability, antitrust and competition and exports, sanctions and embargoes training sessions.

Dave has communicated effectively with all Verizon departments, contractors, CLECs and customers to ensure all work orders written will meet the expectations of the end user. Dave has communicated regularly with all

parties using email, websites, staff meetings and site visits allowing each metric on the scorecard to be met in 2013.

Manager Comments (Optional)

Dave creates a culture of performance for himself as well as his teammates that surround him. Dave completed his masters degree this year and always demonstrates a willingness to learn.

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/05/2013

☒ Employee Signature

Date: 02/26/2013

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

Dave does an outstanding job with all aspects of 360 degree engineering, that was adopted the first quarter of this year. He was able to adjust to the new environment because of his skill sets that he obtained by doing all of the disciplines prior to going 360. Dave has become my go to person when I absolutely have to get something done. He always accepts any challenge and looks for ways to be very successful.

Employee Comments (Optional)

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VZ/WALKER 901

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☒ Manager Signature & Release to Employee

Date: 07/31/2013

☒ Employee Signature

Date: 08/05/2013

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

Dave is a great team member and one that pushes out a lot of work. I rely on him to act for me when I am out of the office and to take matters into his own hands without asking him. He balances his work load demands, without sacrificing his duties at home and does a very good job with it. Glad to have him on my team.

Employee Comments (Optional)

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☒ Manager Signature & Release to Employee

Date: 02/17/2014

☒ Employee Signature

Date: 02/21/2014

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating: Leading

Signatures :

Employee : David Dehaven Date: 2014-02-21

Manager : Carl Gross Date: 2014-02-17

Exhibit LL

2013 Performance

2013 - Year-End Performance Review

Employee: David M Perry , Local Mgr-I&M / Constr
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group:Wireline
Band:7V

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Supervisor Responsibilities

- Description and Measures:

Build strong and diverse teams by actively managing talent, and supporting the performance and

development of my direct reports by:

1. Setting and communicating objectives and priorities and providing ongoing direction.
2. Completing all required performance documents and conducting associated performance discussions (performance agreement/objectives, mid-year review, year-end review) by required deadlines.
3. Providing ongoing

performance feedback, coaching, training and development.

4. Taking appropriate performance improvement action, or administering appropriate discipline when employees do not meet performance standards or expectations.

- Employee Accomplishments / Status:

Manager Comments (Optional)

Discipline and holding the technicians accountable for their results must improve.

Living by the Credo

- Description and Measures: Model the Credo in our daily work including by demonstrating integrity, customer focus, sense of urgency, personal accountability, and teamwork, and by complying with the Business Code of Conduct.

- Employee Accomplishments / Status: Dave maintains good customer relationships and focus. He also works well within his peer group.

Manager Comments (Optional)

Grow Revenue

- Description and Measures: Description:

Growth is more than just a number or a financial target ... it's everybody's job

Measures:

LTS participation->95%

Completion rate->95%

% sales to original due date met->90%

Adherence to T&M billing process

- Employee Accomplishments / Status: Currently enrolled in LTS

Manager Comments (Optional)

Be More Profitable

- Description and Measures:

Description:
Look at all your actions, products and investments through the lens of the shareholder

Measures:
Core to FTTP migrations- State target of 84,298
Migration completion rate- 80% overall
Core to VoiceLink migrations- 84,298
FiOS Hrs/GA less voice only- 4.9hrs by year end
FiOS Hrs/Mtce DSP- 1.7 or 4.7 all in
FiOS I JPD- 4.25
Core Combined JPD- 4.25
Core Returns- <10.8%
OEI- Contribute positively towards district
objective of 3.5
% to Expense- Contribution towards district objective of 98% CORE and 65% FIOS
Direct Expense- Contribution towards district objective of \$75.6M

- Employee Accomplishments / Status:Core JPD YTD- 3.27
M Returns YTD- 6.85

Manager Comments (Optional)
Although JPD has improved December over January there is still room for improvement. Failures have been removed from the cable technicians in order to reach the production requirements.

Improve the Customer Experience

- Description and Measures:Description:
Provide a positive and compelling customer experience. Continually ask customers if there is anything else "I" can do for you.

Measures:
Customer Calls to the FSC- Technician- 25
I-codes (Voice, HSI, FIOS)- 6.5%, 6%, 1.5% respectively
Repeats (Voice, HSI Repeats)- 7.5%, 7%, 3.5%
BB genius Usage->80%
MDU Checklist->95%
Skycreek compliance- >95%

- Employee Accomplishments / Status:I Codes YTD- 8.90%, 7.57%
M Codes YTD- 8.47%, 7.85%

Manager Comments (Optional)
The overall rework of this group must improve. None of the objectives have been met YTD

Fuel our Culture

- Description and Measures:

Description:
Make embracing change a part of our culture and a competitive advantage-- live the Credo.

Measures:

Dsp NPS- Contribute to State objective of NPS >25

Reduce multi-repeats- no repeats greater than 2X by 4thqtr

Eliminate cultural issues causing long duration repairs- MTTR <48hrs

Reduce subsequents by creating a culture to serve- no subs greater than 3 by 4thqtr

OSHA injury rate- 4.25%

MV incident rate- 4%

Lead by

Example. Follow up, complete "To Dos" before deadline, proactively address issues

- **Employee Accomplishments / Status:**OSHA Rate-5.25%

MV Rate- 0

Manager Comments (Optional)

Additional focus and observations will be necessary to improve the safety of this group

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 01/22/2013

☒ Employee Signature

Date: 01/22/2013

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Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

Additional focus is required on the daily/monthly deliverables. These requirements are necessary for the tracking of results. Monthly sessions must be conducted with all associates on an individual basis regarding results and areas of improvement. This piece is key critical in order for the results to improve. Dave's day needs to have a more designed structure for this to be accomplished. It is imperative that what is being asked for is what is being delivered.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 07/31/2013

☒ Employee Signature

Date: 08/02/2013

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

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VZ_WALKER_320

Timely input of the monthly deliverables remain a challenge. Dave must improve his time management skills in order to stay on top of his requirements. There must be an increase in the scrutiny and oversight of this group as well as holding the low performers accountable for their lack of performance. The Area Manager cannot continue to remind and monitor these requirements. The accountability resides with Dave. Production has improved, but it is not consistent number. The objective is a 4.25 and must be maintained in 2014. Dave is currently on a performance improvement plan. Significant result improvements must happen quickly in 2014 in order for Dave to be removed from this plan.

Employee Comments (Optional)

Dispute this evaluation and requested a meeting w/ AOM and Director.

☒ Manager Signature & Release to Employee

Date: 02/25/2014

☒ Employee Signature

Date: 02/28/2014

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating:Developing

Signatures :

Employee : David Perry

Date: 2014-02-28

Manager : Carol Shields

Date: 2014-02-25

Exhibit

MM

2013 Performance

2013 - Year-End Performance Review

Employee: Joseph Scelsa , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- **Description and Measures:** Model the Credo in our daily work including by demonstrating integrity, customer focus, sense of urgency, personal accountability, and teamwork, and by complying with the Business Code of Conduct.

- Employee Accomplishments / Status: Daily work responsibility includes meeting with customers onsite and communicating with them according to the credo. Job also entails modeling the credo in the office and taking personal accountability with each job. Teamwork is exemplified by going above and beyond normal work responsibility to meet multiple customer short timeframe demands. Furnishing equipment and expediting material shipments to meet customer deadlines is essential to establish customer relationships.

Manager Comments (Optional)

Accelerate Revenue Growth

- Description and Measures: Meet/exceed network expansion and facility build targets.

Support new products and global product expansion
drive products on-net, accelerate speed to market and service delivery intervals
optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide converged communication, information, entertainment services.

Fiber to Cell Site (Achievable) - Targets per scorecard

- o Site Surveys
- o EWO's Issued

- Employee Accomplishments / Status:

In the timeframe from January 2nd to June 28th 165 work orders were issued to construction. Out of the 165 orders, there were a wide variety of jobs that were issued.

These ranged from pole jobs, splitter jobs, chapter 63 jobs, DS3, VON, TLS, and MDU/MTU overlay job. Many of these jobs entail site surveys for properly facilitating the service request according to the job detail. Kendal Crosslands relocation job in a

short time frame moved from existing copper circuits to Fios solution. This decision saved time splicing copper and brought the customer on FIOS.

In the timeframe from August until December of 2013 137 total work orders were issued.

Total number of work orders for the entire year was 302.

These work orders incorporated every type of service. Included out of all of them was one achievable cell site order which was

expedited and turned up on time.

Manager Comments (Optional)

Increase Profit Margin

- Description and Measures:

Aggressively control and reduce all operating and capital costs, meeting 2013 budget commitments. Consolidate systems, operations and facilities

Increase productivity by simplifying, standardizing and automating processes.

Drive network convergence to improve capex and opex efficiency.

Cut energy, fuel and paper consumption to reduce costs and environmental impact.

- Network Engr Capital (\$M) – Core Budget Performance - District

target per scorecard

- FTTCS Capital – District target per scorecard
- FTTCS \$ per site (6-mo rolling ave cost) – District target per scorecard
- Network Engr Expense – District target per scorecard

- Employee Accomplishments / Status: Engineer what is necessary on the job and reuse equipment where applicable. This was done in multiple scenarios for utilizing existing MUX cabinet frames. New equipment was ordered where necessary, but use the existing frame and space at customer and RT locations. Electronic work orders are issued and all plans are scanned reducing office costs. All customer plans are requested sent as PDF files to eliminate paper and space in the office.

Manager Comments (Optional)

Leverage Best Network and Improve Customer Service

- Description and Measures:

Improve network availability
 Meet SR Response Time, SI, Prints on time, ECCD and FAD objectives
 Leverage technology to deliver network and services reliability
 Apply a customer - first - attitude to all transactions, products and services.
 Improve quality continuously across all departments including internal and external customer services.
 Meet customer requirements through an always on, dependable and scalable network. Operate with a sense of urgency

All %'s are subject to change based on Scorecard objectives

- % FAD – District target 95%.
- Standard Interval Compliance – District target 99%.
- Prints Issued on Time – 95%
- Engineering Backlog – Track contributions.
 - o Pre-RID as % of Tot Pending – District target 11.7%
 - o Post-RID as % of Tot Pending – District target 46.6%
 - o TFAS OTP-Tracking

RequestNet SR Intervals OTP-Firm Orders / FOC – target 95%.

- o DS1(24 hrs), DS3-48 hrs, OCn/Ethernet(72 hrs), FTTCS(24 hrs)
- o Q Code Reduction (>90 days old - Tracking process TBD)

Engineer Workload Volumes- Service orders resolved, EWO's issued, NJUNS, etc.
 Process 4824's in 24hrs to ensure customer service to Construction
 Communication to all stakeholders

- Employee Accomplishments / Status: All prints pertaining to SR's for high bandwidth orders were issued ahead of time and within the dates requested. Turn ups were also on time with at customer locations to order due date.

Manager Comments (Optional)

Create a Culture of Performance**- Description and Measures:**Get the job done the right way.

Be accountable for results, adhere to our core values and operate with a sense of urgency.

Incorporate a CWS experiment

Drive change and innovation that brings results to the bottom line.

Utilize skills acquired from Adaptive Leadership Training.

Performance Development- Engage in training and development for yourself and your assigned partner in the creation of the 360 degree Engineer, ie, requestnet, Tirks, mSolve

- Employee Accomplishments / Status:

Extensive hands on training has been ongoing to accomplish and handle the 360 engineer concept. Learning multiple systems and integrating them all is challenging but rewarding to meet the demands of customers and management. Establish and implement new TLS/VON and MUX design for high revenue service orders. Accomplishes many customer requests for expediting service orders for circuit turn up. Utilizes multiple Engineering

systems (TIRKS, Requestnet, IDDS etc.) and works seamlessly with planning for designing high bandwidth work prints.

Manager Comments (Optional)**Take Market Share****- Description and Measures:**Meet/Exceed Network Expansion and facility built targets:

Total Premises passed

SFU

MXU

Total Premises Open for Sale

Both residential and commercial properties.

- Employee Accomplishments / Status:

The total number of premises passed from August to December are as follows.

Total SFU: 10

Total MXU network created: 1234 MDU, 114 MTU, 11 SBU.

Total number of SR's issued from August to December were 27. Total of 49 jobs were issued for the year. This included installing new MUX equipment designed for new TLS and VON services. SONET rings were also included on some of these jobs for high bandwidth orders. Asset

restoration jobs were issued for critical RT locations for battery and rectifier replacements.

Manager Comments (Optional)**Section 2 - Performance Agreement**

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/13/2013

☒ Employee Signature

Date: 02/20/2013

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

Manager Performance Summary

Joe continues to learn the new roles associated with the 360 degree engineering. Joe strives to communicate effectively to his construction counterparts. He works to ensure that they have the appropriate information. Joe is a performer who is up to the challenge of the 360 engineering.

In the 2nd half of 2013 Joe should continue to strives in the Vendor Management realm. It is imperative that Joe documents the errors that are made by the engineering vendors and communicate it back to them.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 07/31/2013

☒ Employee Signature

Date: 07/31/2013

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

PA-DE had a very successful results year in 2013. Capital, Expense, MDU/MTU, Prints Issued, Standard Interval Compliance were all positive. FOC intervals were a negative for both the District and Sub-District Teams.

In 2013 Joe continued to expand his talents, getting closer to the 360 Turf model. He is very passionate and cares about the work he performs. The HBW role is the area that Joe must improve upon; he must become independent with SR movement, survey and design completion.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/19/2014

☒ Employee Signature

Date: 02/19/2014

Section 5 - Performance Rating

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VZ_WALKER_405

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating:**Performing**

Signatures :

Employee : Joseph Scelsa Date: 2014-02-19

Manager : Brian Magee Date: 2014-02-19

Exhibit NN

2013 Performance

2013 - Year-End Performance Review

Employee: Ernest A Padovani , Engr III Spec-Ntwk Eng&Ops
Manager: Brian Magee, Mgr-Ntwk Eng&Ops
Business Group: Wireline
Band: 7T

- Review and update the employee's objectives as appropriate.
- Review the employee's accomplishments/status.
- Update the **Manager Comments** for each objective summarizing results achieved or progress made (optional).
- Summarize the overall results achieved in the **Manager Performance Summary** box.

In evaluating the employee's overall performance contribution, consider the extent to which the employee demonstrated behaviors that support Verizon's Credo.

Supervisors must substantiate performance ratings based on specific performance information, examples and observations pertinent to results achieved.

NOTE: DO NOT PROVIDE OR DISCUSS THE REVIEW DOCUMENT AND/OR RATING WITH THE EMPLOYEE UNTIL YOU HAVE RECEIVED NOTIFICATION FROM HUMAN RESOURCES.

Section 1 - Objectives

Living by the Credo

- Description and Measures: Model the Credo in our daily work including by demonstrating integrity, customer focus, sense of urgency, personal accountability, and teamwork, and by complying with the Business Code of Conduct.

- Employee Accomplishments / Status: Answer e-mails in timely manner.
Return calls in timely manner.
Do site surveys with customers in timely manner.
Fill in for other engineers who are off or on a project.
Work with developers to get Verizon facilities in their projects

Manager Comments (Optional)

Accelerate Revenue Growth

- Description and Measures: Meet/exceed network expansion and facility build targets.
Support new products and global product expansion
drive products on-net, accelerate speed to market and service delivery intervals
optimize broadband capabilities to stay ahead of increasing demand for bandwidth - enhance fios to provide
converged communication, information, entertainment services.
Fiber to Cell Site (Achievable) - Targets per scorecard

- o Site Surveys
- o EWO's Issued

- Employee Accomplishments / Status:

Total Jobs Issued : 188

A) Project manages work to come in on time and on cost. Project manage work to be issued on time and completed on time to keep customer satisfied. Funnel work for major projects to Contract services. Contract cost our lower then Core cost
B) Design best job at best cost.
C) Talk to contractors, developers, consultants about ordering Verizon services.
D) Issue work prints on time
E) Work with

PennDot, Townships, County, developers, consultants and other utilities to minimize the affect on Verizon facilities

Manager Comments (Optional)

Increase Profit Margin

- Description and Measures:

Aggressively control and reduce all operating and capital costs, meeting 2013 budget commitments.
Consolidate systems, operations and facilities
Increase productivity by simplifying, standardizing and automating processes.
Drive network convergence to improve capex and opex efficiency.
Cut energy, fuel and paper consumption to reduce costs and environmental impact.

- Network Engr Capital (\$M) - Core Budget Performance - District

target per scorecard

- FTTCs Capital - District target per scorecard
- FTTCs \$ per site (6-mo rolling ave cost) - District target per scorecard

- Network Engr Expense – District target per scorecard

- Employee Accomplishments / Status:

- A) Project manage work. Make sure work is issued and completed on time.
- B) Funnel major projects to Contract Services. Contract costs are lower then Core cost.
- C) Work with PennDot, Townships, County, developers, consultants and other utilities to minimize the affect on Verizon facilities.
- D) Get job done right the first time.
- E) In some cases have developer or customer place Verizon provided conduit.
- F) Issue work prints on time
- G) Work on more then one project at a time.
- H) Work with American U-Tel on bridge projects to keep cost down.
- I) Work with construction and contract services to keep cost down and have work done in timely manner and closed out.

Manager Comments (Optional)

Leverage Best Network and Improve Customer Service

- Description and Measures:

Improve network availability
 Meet SR Response Time, SI, Prints on time, ECCD and FAD objectives
 Leverage technology to deliver network and services reliability
 Apply a customer - first - attitude to all transactions, products and services.
 Improve quality continuously across all departments including internal and external customer services.
 Meet customer requirements through an always on, dependable and scalable network. Operate with a sense of urgency

All %'s are subject to change based on Scorecard objectives

% FAD – District target 95%.

- Standard Interval Compliance – District target 99%.
- Prints Issued on Time – 95%
- Engineering Backlog – Track contributions.
 - o Pre-RID as % of Tot Pending – District target 11.7%
 - o Post-RID as % of Tot Pending – District target 46.6%
 - o TFAS OTP-Tracking

RequestNet SR Intervals OTP-Firm Orders / FOC – target 95%.

- o DS1(24 hrs), DS3-48 hrs, OCn/Ethernet(72 hrs), FTTCs(24 hrs)
- o Q Code Reduction (>90 days old - Tracking process TBD)

 Engineer Workload Volumes- Service orders resolved, EWO's issued, NJUNS, etc.
 Process 4824's in 24hrs to ensure customer service to Construction
 Communication to all stakeholders

- Employee Accomplishments / Status: SR work orders issued: 32

SR work inprogress :27

- A) Answer SR's in a timely manner.
- B) Issue HBW work orders before date of Issuance.
- C) Do site surveys with customers in timely manner
- D) Look at different ways to service customer

E) Work with other engineers on engineering problems

Manager Comments (Optional)

Create a Culture of Performance

- Description and Measures: Get the job done the right way.
Be accountable for results, adhere to our core values and operate with a sense of urgency.
Incorporate a CWS experiment
Drive change and innovation that brings results to the bottom line.
Utilize skills acquired from Adaptive Leadership Training.
Performance Development- Engage in training and development for yourself and your assigned partner in the creation of the 360 degree Engineer, ie Tirks, Requestnet, Msolve etc

- Employee Accomplishments / Status:

SME for VBUILD
SME for PRS
SME for VLicence
Help train engineers in VBuild, PRS and VLicence
SPOC for PECO
SPOC for PennDot and townships
A) Get job done right the first time.
B) Get designs done in a timely manner
C) Project manage work.
D) Work with other engineers to solve engineering problems.
E) Work with other engineers on designs.
F) Work with construction, contract services on different projects.
G) Work on more
then one project at a time.
H) Work with PennDot, municipalities, consultant and other utilities on different projects.
I) Use adaptive engineering.

Manager Comments (Optional)

Take Market Share

- Description and Measures: Meet/Exceed Network Expansion and facility built targets:

Total Premises passed
SFU
MXU
Total Premises Open for Sale
Both residential and commercial properties.

- Employee Accomplishments / Status: SFU HH 58
MXU HH 176

A) Support other engineers on different projects and designs.
B) Talk to contractors, developers, consultants about ordering Verizon services.

- C) Project manage work to get jobs issued and completed on time and on cost to satisfy customer.
- D) Get job done right the first time.
- E) Give best possible customer care and service.
- F) Treat everyone as a Verizon customer

Manager Comments (Optional)

Section 2 - Performance Agreement

Status: Completed

Period: January 1 - December 31

Manager Comments (Optional)

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/13/2013

☒ Employee Signature

Date: 02/19/2013

Section 3 - Mid-Year Review

Status: Completed

Period: January 1 - June 30

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VZ_WALKER_339

Manager Performance Summary

Ernie continues to learn the new roles associated with the 360 degree engineering. Ernie always has the customer in mind when completing his tasks. Ernie's experience and knowledge assist him to ensure that he is providing the services required by his customers. Ernie is a strong performer who completes his tasks and is always willing to take on more and assist other team members. Ernie has been an essential part of

the JU sub committee in assisting Stacey Culbreath in his new Joint Use position.

In the 2nd half of 2013 Ernie should continue to strive to communicate effectively to his audience and provide his customers including PECO.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 08/01/2013

☒ Employee Signature

Date: 08/01/2013

Section 4 - Year End Review

Status: Completed

Period: January 1 - December 31

Manager Performance Summary

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VZ_WALKER_340

PA-DE had a very successful results year in 2013. Capital, Expense, MDU/MTU, Prints Issued, Standard Interval Compliance were all positive. FOC intervals were a negative for both the District and Sub-District Teams.

Ernie is a true Team Player, he accepted a transfer to a different turf, then accepted a larger turf without hesitation, he took a lead with Peco issues and he was quick to voice his opinion on District/process issues. Ernie is a solid Engineer on BAU/FTTP issues, he contributed to the overall success of the Team in 2013. Going forward, Ernie has room for growth on HBW/HiCap issues, which is essential for success in the coming year.

Employee Comments (Optional)

☒ Manager Signature & Release to Employee

Date: 02/20/2014

☒ Employee Signature

Date: 02/21/2014

Section 5 - Performance Rating

Leading	<i>Employee sustained performance above objectives, requirements and expectations.</i>
Performing	<i>Employee sustained performance meeting objectives, requirements and expectations and periodically exceeded them.</i>
Developing	<i>Performance did not meet objectives, requirements and expectations; some or all objectives were not met and improvement is needed.</i>
New	<i>Achievement relative to performance objectives cannot be evaluated due to short tenure in position.</i> <i>- New to Company (less than 6 months in position). Note: A "New" rating may not be used as an end-of-year rating for any transferred or promoted employee.</i> <i>- Performing duties less than 3 months of the year due to an authorized absence or leave.</i>

Performance Rating:**Performing**

Signatures :

Employee : Ernest Padovani

Date: 2014-02-21

Manager : Brian Magee

Date: 2014-02-20

Exhibit 00

- B. The exact date or best available timeframe Defendant(s) can set forth as to when the decision to end or terminate Plaintiff(s) employment was made;¹ and
- C. The exact date upon which Defendant(s) contend Plaintiff(s) was first informed of the decision to end or terminate Plaintiff(s) employment and the method of communication about and concerning the termination notification (i.e. in person, via telephone, e-mail, text, etc...).

RESPONSE: Defendants object to this Interrogatory because it is compound, thereby comprising three separate Interrogatories, not one. Subject to and without waiver of Defendants' general and specific objections, Verizon submits:

- A. Brian Magee and Joseph Muccilo participated in the decision to end Plaintiff's employment with Defendants.
- B. Plaintiff was selected for separation as part of a reduction in force in or around April 2015.
- C. Plaintiff was informed of the decision to end her employment by Brian Magee in or around April 2015.

INTERROGATORY NO. 4: [VERBAL OR WRITTEN DISCIPLINE INFORMATION]

If Defendant(s) contend Plaintiff(s) received any verbal or written reprimands or discipline during the course of Plaintiff(s) employment, identify with specificity:

- A. The exact dates of the verbal or written reprimand(s) or discipline;
- B. The names of the supervisor(s) or manager(s) who were involved with administering the reprimand(s) or discipline referenced in subpart (a) above;
- C. The nature or summary of reason(s) for the reprimand(s) or discipline referenced in subpart (A) above; and

¹ Defendant(s) should set forth an exact date and only identify a "timeframe" if it is incapable of setting forth an exact date.

VERIFICATION

I, Brian Magee, am a Manager for Verizon Pennsylvania LLC and Verizon Services Corporation (Defendants), and I am authorized to execute this verification on Defendants' behalf. I verify that the statements made in the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information and belief.

The facts and matters stated therein are not exclusively within my personal knowledge or of any one individual at Defendant; rather, the facts stated therein have been assembled, on behalf of Defendant and with the assistance of counsel, by authorized employees of Defendant with personal knowledge of the subject matter of the response and/or information and belief as to the truth and/or accuracy thereof. Subject to the terms of this verification, I understand that the statements herein are subject to the penalties 18 Pa. Cons. Stat. §4904, relating to unsworn falsification to authorities.

Date: April 6, 2016

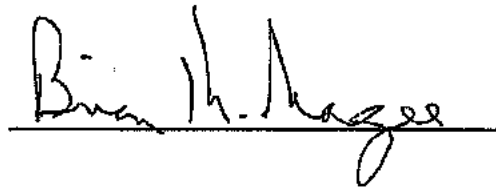
A handwritten signature in black ink, reading "Brian H. Magee", is written over a horizontal line.

Exhibit PP



KARPF,
KARPF &
CERUTTI, P.C.

Christine Burke <cburke@karpf-law.com>

Defendants' Supplemental Document Production

Christine Burke <cburke@karpf-law.com>

Mon, Aug 29, 2016 at 6:35 PM

To: "Brown, Valerie E." <vbrown@reedsmith.com>

Cc: "kristin@karpf-law.com" <kristin@karpf-law.com>, "Barras, Joel S." <JBarras@reedsmith.com>

Hi Val - confirming receipt.

As a follow up to Friday's conversation, the woman that Mr. Gross named as sending his own rate & rank list to was Diane Ridullo.

[Quoted text hidden]

[Quoted text hidden]



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**KARPF,
KARPF &
CERUTTI, P.C.**

Christine Burke <cburke@karpf-law.com>

Walker v. Verizon

Brown, Valerie E. <vbrown@reedsmith.com>

Thu, Oct 6, 2016 at 11:03 AM

To: Christine Burke <cburke@karpf-law.com>

Cc: "Barras, Joel S." <JBarras@reedsmith.com>, "kristin@karpf-law.com" <kristin@karpf-law.com>

Christine,

Verizon has searched its records and has not located a ranking from Brian Magee (sent to Diane Redilla or otherwise) from 2015 during the time period leading up to the RIF, as requested.

Can you please update us on the status of the request related to Ms. Walker's job offers and work history following her separation from Verizon as requested in our September 21 letter?

Thank you,

Valerie E. Brown

215.851.8859

vbrown@reedsmith.com

ReedSmith LLP

Three Logan Square

Suite 3100

1717 Arch Street

Philadelphia, PA 19103

+1 215 851 8100

Fax +1 215 851 1420

From: Christine Burke [mailto:cburke@karpf-law.com]

Sent: Thursday, September 22, 2016 11:19 AM

To: Brown, Valerie E.

Cc: Barras, Joel S.; kristin@karpf-law.com

Subject: Re: Walker v. Verizon

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

[REDACTED]

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Christine Burke <cburke@karpf-law.com>

Walker v. Verizon

Christine Burke <cburke@karpf-law.com>

Thu, Oct 6, 2016 at 12:32 PM

To: "Brown, Valerie E." <vbrown@reedsmith.com>

Cc: "Barras, Joel S." <JBarras@reedsmith.com>, "kristin@karpf-law.com" <kristin@karpf-law.com>

Do you mean for Carl Gross?

Two points: your office still never responded about the outstanding issues respecting the final ediscovery I made. I will re-forward the email.

One: I believe we have a formal response drafted which should go out today - re: your inquiry about

[Quoted text hidden]

[Quoted text hidden]



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Christine Burke <cburke@karpf-law.com>

Walker v. Verizon

Brown, Valerie E. <vbrown@reedsmith.com>

Thu, Oct 6, 2016 at 1:08 PM

To: Christine Burke <cburke@karpf-law.com>

Cc: "Barras, Joel S." <JBarras@reedsmith.com>, "kristin@karpf-law.com" <kristin@karpf-law.com>

For both Carl Gross and Brian Magee.

Valerie E. Brown

215.851.8859

vbrown@reedsmith.com

ReedSmith LLP

Three Logan Square

Suite 3100

1717 Arch Street

Philadelphia, PA 19103

+1 215 851 8100

Fax +1 215 851 1420

From: Christine Burke [mailto:cburke@karpf-law.com]**Sent:** Thursday, October 06, 2016 12:33 PM

[Quoted text hidden]

[Quoted text hidden]



KARPF,
KARPF &
CERUTTI, P.C.

Christine Burke <cburke@karpf-law.com>

Defendants' Supplemental Document Production

Brown, Valerie E. <vbrown@reedsmith.com>

Mon, Aug 15, 2016 at 10:52 AM

To: "cburke@karpf-law.com" <cburke@karpf-law.com>

Cc: "kristin@karpf-law.com" <kristin@karpf-law.com>, "Barras, Joel S." <JBarras@reedsmith.com>

Christine,

Please see the attached supplemental document production, which includes the requested performance evaluations for the employees who reported to Carl Gross in 2013 and 2014. I am missing one employee – Chirag Jagwani—but will supplement as soon as I receive his performance evaluations. I have also attached the performance evaluations you requested for Ms. Walker. For the FAC Verification reports, we were able to pull the reports from June 2014 through March 2015 in a condensed set rather than all of the individualized reports. It has the individualized information, it is just in a single report for each year. The reports were not generated until August 2014 by the department, so we have the report data going back to June 2014.

On the remaining outstanding items:

- I am waiting on the additional org charts from Brian Magee and will send to you once I receive them.
- I have also followed up with him to confirm whether he has any emails or documents submitted to Parker regarding the RIF. I will also
- There were no RIF reports generated for Carl Gross' team as part of the RIF in which Suzette was affected.
- I am finalizing the e-discovery and hope to have it to you in the next couple of days.

Please let me know if I am missing any other outstanding items I owe to you.

Thanks,

Valerie E. Brown

215.851.8859

vbrown@reedsmith.com

ReedSmith LLP

Three Logan Square

Suite 3100

1717 Arch Street

Philadelphia, PA 19103

+1 215 851 8100

Fax +1 215 851 1420

* * *

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Disclaimer Version RS.US.201.407.01

3 attachments

 **VZ_Walker_Defendant_s Supplemental Document Production (819 -1024).PDF**
2503K

 **VZ_Walker_Defendant_s Supplemental Document Production (1025) (FAC Verification Report 6_2014-12_20).XLSX**
86K


 **Defendants_ Supplemental Document Production (1026) (FAC Verification Report January - March 2015).XLSX**
46K

Exhibit QQ

Exhibit RR

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Pescatore, Michael A (Mike)
Sent: Thursday, April 02, 2015 10:36 AM
To: Parker, Melissa (Missy)
Cc: Bragg, William F; O'Donoghue JR, Edward C (Colton); Muccilo, Joseph; Sisk JR, Thomas W (Tom Sisk)
Subject: RE: RIF Business Cases

Missy – As requested.

From: Parker, Melissa (Missy)
Sent: Tuesday, March 31, 2015 3:07 PM
To: Bragg, William F; O'Donoghue JR, Edward C (Colton); Muccilo, Joseph; Sisk JR, Thomas W (Tom Sisk)
Cc: Pescatore, Michael A (Mike)
Subject: FW: RIF Business Cases
Importance: High

All,

Based on our call yesterday, I have provided Mike with the template to submit employee names to me so that I can create the cases for you. Please try to have these to me by COB tomorrow if possible (no later than Thursday) to ensure your teams will have enough time to complete the cases in the system. Just as a recap of our call yesterday the process is as follows:

- Step 1: Mike will consolidate the names on the attached spreadsheet and send to Missy by COB Wednesday (04/01/15)
- Step 2: Missy creates a business case in the system
- Step 3: Missy sends the respective Director the assigned RIF business case #(s)
- Step 4: Director/selection manager goes into system and rates/ranks employees and adds comments as appropriate based on what we reviewed on the call yesterday (remember to include comments for impacted employees even if they are not ranked a 1 or 5)

Step 5: Director advises to Missy via email when cases are complete
Step 6: Missy will reach out to the Director or manager to discuss and update the case to prepare for legal review

Quick link to the system:

https://ps-prdsso.ehr.verizon.com/psc/vzehpra/EMPLOYEE/HRMS/c/VERIZON_FORCE_MANAGEMENT.B_FMS_VLSS_BC.GBL?FolderPath=PORTAL_ROOT_OBJECT.VERIZON_FORCE_MANAGEMENT.VFMS_VLSS_MANAGEMENT.B_FMS_VLSS_BC_GBL_1&IsFolder=false&IgnoreParamTempl=FolderPath%2cisFolder&

Thanks,

M-

IMP Case #	# of Cases Combining w/ this one case, or is the only case in this category	Selector Manager (Manager conducting business case)	Notification Manager	Case Type/Description Elaboration / Function Elaboration / Rank & Rate	Notification Date	Reduction Please give details as to why any of your org is being impacted, why it was selected and what will happen to workload (absorbed / redistributed / eliminated)	Impacted EMPID	Last First Name	Title	Rank	Director	Previous Director (if applicable)
	HI Plan Case	Frank Suenzo	Frank Suenzo	Rate and Rank	4/23/2015	Planning employees impacted. Their work will be absorbed by other Planners in the group. Was selected b/c of opportunity to downsize group.	1162120	Sprankle, Lee	Engr IV Civil-Work Eng&Ops	7	Suk	
	HI ROW Case	Shawn Cross	Shawn Cross	Rate and Rank	4/23/2015	Right of Way Engineering employees impacted. Their work will be absorbed by other ROW Engineers in the group, as well as outsourced when possible. Was selected since it is being considered for future consolidation state wide.	1125061	Flint, Richard	Engr III Spec-Work Eng&Ops	7	Suk	
	CNE Case	Karen Trenchard	Karen Trenchard	Rate and Rank	4/23/2015	Customer Network Engineering employees impacted. Their work will be absorbed by other CNE Engineer and Contingent Workers in the group, as well as outsourced when possible. Was selected since it is being considered for future consolidation state wide.	1161066	Prescarato, Jane	Engr III Spec-Work Eng&Ops	7	Suk	
	SPOC Case	Michael Pescatore	Michael Pescatore	Rate and Rank	4/23/2015	SPOC Providing Engineering employees impacted. Their work will be absorbed by other SPOC Engineers and Contingent Workers in the group, as well as outsourced when possible. Was selected b/c of opportunity to leverage outsourcing.	1354516	Turkic, Valerie	Engr III Spec-Work Eng&Ops	7	Suk	
	FE Case	Karen Trenchard	Karen Trenchard	Rate and Rank	4/23/2015	Field Engineering employees impacted. Their work will be absorbed by other Field Engineers in the group, as well as outsourced when possible. Was selected b/c of opportunity to downsize group.	1095951	Sears, Tom	Engr III Spec-Work Eng&Ops	7	Suk	
	Combined Design Case	Tom Suk	Shawn Cross	Rate and Rank	4/23/2015	Design Engineering employees impacted. Their work will be absorbed by other Design Engineers and Contingent Workers in the group, as well as outsourced when possible. Was selected b/c of opportunity to downsize group and further outsourcing opportunities.	1167120	Aulard, Pat	Engr IV Spec-Work Eng&Ops	7	Suk	
	Combined Design Case	Tom Suk	Unda Alento	Rate and Rank	4/23/2015	Design Engineering employees impacted. Their work will be absorbed by other Design Engineers and Contingent Workers in the group, as well as outsourced when possible. Was selected b/c of opportunity to downsize group and further outsourcing opportunities.	1440774	Brennan, Mike	Engr III Spec-Work Eng&Ops	7	Suk	
	Combined Design Case	Tom Suk	Bryan DePaul	Rate and Rank	4/23/2015	Design Engineering employees impacted. Their work will be absorbed by other Design Engineers and Contingent Workers in the group, as well as outsourced when possible. Was selected b/c of opportunity to downsize group and further outsourcing opportunities.	1277411	Johnson, Ralph P	Engr III Spec-Work Eng&Ops	7	Suk	
	Combined Design Case	Tom Suk	Robert Schneider	Rate and Rank	4/23/2015	Design Engineering employees impacted. Their work will be absorbed by other Design Engineers and Contingent Workers in the group, as well as outsourced when possible. Was selected b/c of opportunity to downsize group and further outsourcing opportunities.	1321831	Leonard, Lawrence R	Engr III Spec-Work Eng&Ops	7	Suk	

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Combined Design Case	Tom Sisk	Frank Soverio	Rate and Rank	4/23/2015	Design Engineering employees impacted. Their work will be absorbed by other Design Engineers and Contingent Workers in the group, as well as outsourced when possible. Was selected b/c of opportunity to downsize group and further outsourcing opportunities.	1545859	Berg, JR Richard	Engr III Spec-Ntwk Eng&Ops	7	Sisk	
Combined Design Case	Tom Sisk	Frank Soverio	Rate and Rank	4/23/2015	Design Engineering employees impacted. Their work will be absorbed by other Design Engineers and Contingent Workers in the group, as well as outsourced when possible. Was selected b/c of opportunity to downsize group and further outsourcing opportunities.	1372202	Fisher, Paul M	Engr III Spec-Ntwk Eng&Ops	7	Sisk	
Combined Design Case	Tom Sisk	Jason Cason	Rate and Rank	4/23/2015	Design Engineering employees impacted. Their work will be absorbed by other Design Engineers and Contingent Workers in the group, as well as outsourced when possible. Was selected b/c of opportunity to downsize group and further outsourcing opportunities.	1377113	Jasper, Ronald A	Engr III Spec-Ntwk Eng&Ops	7	Sisk	
Combined Design Case	Tom Sisk	Christopher Moore	Rate and Rank	4/23/2015	Reduction in Field Engineering and Vendor Mgmt Groups. Work to be redistributed among Va team and MD, DC resources	1241982	Scheldemann, John M	Engr III Spec-Ntwk Eng&Ops	7	Sisk	
Combined Robert Morris	Robert Morris	Robert Morris	Functional Elimination/R&R	4/23/2015	Reduction in Field Engineering and Vendor Mgmt Groups. Work to be redistributed among Va team and MD, DC resources	1075469	Crouch, Carl R	Engr III Spec-Ntwk Eng&Ops	7	O'Donoghue	
Combined Robert Morris	Robert Morris	Robert Morris	Functional Elimination/R&R	4/23/2015	Reduction in Field Engineering and Vendor Mgmt Groups. Work to be redistributed among Va team and MD, DC resources	1187241	Johnson, Thomas A	Engr III Spec-Ntwk Eng&Ops	7	O'Donoghue	
Individual Case	Alye Fahry	Alye Fahry	Functional Elimination/R&R	4/23/2015	Reduction in Field Engineering and Vendor Mgmt Groups. Work to be redistributed among Va team and MD, DC resources	1255822	Remirez, Les	Engr III Spec-Ntwk Eng&Ops	7	O'Donoghue	
Individual Case	Rob Landin	Rob Landin	Functional Elimination/R&R	4/23/2015	Reduction in Field Engineering and Vendor Mgmt Groups. Work to be redistributed among Va team and MD, DC resources	1167742	Krell, Steven T	Engr IV Spec-Ntwk Eng&Ops	7	O'Donoghue	
Combined Debbie Wilhel	Debbie Wilhel	Debbie Wilhel	Functional Elimination/R&R	4/23/2015	Reduction in the CO Engineering team. Work will impact the processing of all CO infrastructure growth and modernization. Work will be redistributed among the remaining team members. Additional OT by the remaining team is expected to manage volumes.	1503501	Wood, Rudward	Engr III Spec-Ntwk Eng&Ops	7	O'Donoghue	
Combined Debbie Wilhel	Debbie Wilhel	Debbie Wilhel	Functional Elimination/R&R	4/23/2015	Reduction in the CO Engineering team. Work will impact the processing of all CO infrastructure growth and modernization. Work will be redistributed among the remaining team members. Additional OT by the remaining team is expected to manage volumes.	1287715	Wright, Kimberly C	Engr III Spec-Ntwk Eng&Ops	7	O'Donoghue	
Individual Case	David Gray	David Gray	Functional Elimination/R&R	4/23/2015	Reduction impacts the Eastern Shore Design Team. EE manages Engineering Assistants. Manager will realign associates to another supervisor	1214516	Byrne, Terrence M	Supr-Ntwk Eng&Ops	7	O'Donoghue	

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Individual Case	William T Lee III	William T Lee III	Functional Elimination/R&R	4/23/2015	Reduction impacts the Engineering team in (GTE) in the Piedmont Va area. Work load will be redistributed within team.	1363747	Deller, Marlene Diana	Engr III Spec-Ntwk Eng&Ops	7	O'Donoghue
Individual Case	Michael Silway	Michael Silway	Functional Elimination/R&R	4/23/2015	Reduction impacts the HBW project management functions across District. Employee supports HBW provisioning process with TMS. Work will be redistributed within team.	1180554	Norwood Jr, James W	Engr IV Spec-Ntwk Eng&Ops	7	O'Donoghue
Individual Case	Frank Sarchiapone	Frank Sarchiapone	Functional Elimination/R&R	4/23/2015	Reduction will impact ICF Provisioning team supporting Potomac SAs. May delay 48hr processing metrics. Work will be redistributed within provisioning team.	1203149	Sekinger, Alejandra M	Engr III Spec-Ntwk Eng&Ops	7	O'Donoghue
Individual Case	Kenneth Crump	Kenneth Crump	Functional Elimination/R&R	4/23/2015	Reduction impacts FTTC Project Mgmt functions across district. Employee supports scheduling, tracking, and interface with Carriers, Engr Team and Construction. Work will be redistributed within team.	1270982	Whitson Jr, Shawn R	Colt-Prod/Proj Mgt	7	O'Donoghue
Individual Case	Ben Doyle	Ben Doyle	Functional Elimination/R&R	4/23/2015	Reduction impacts the Engineering team in (GTE) in the Eastern Va area. Work load will be redistributed within team.	1240713	Frank Barbara R	Engr III Spec-Ntwk Eng&Ops	7	O'Donoghue
Individual Case	Colton O'Donoghue	Colton O'Donoghue	Functional Elimination/R&R	4/23/2015	Reduction of Field Engineering Manager for the MD DC team. Impacts all Engineering and Installation functions for HBW, PTV, and PDS growth. Work to be assumed by VA FE Manager	1221984	Fabry, Alysevnik I	Mgt-Ntwk Eng&Ops	6	O'Donoghue
Individual Case	Ron Silinskie	John Healy	Rank & Rate	4/23/2015	Northeast Design Team was selected due to ability to outsource and increased efficiency potential. Work will be absorbed and/or outsourced.	1247186	Miller, Thomas	Engr III Spec-Ntwk Eng	7	Joseph Marzello
Individual Case	Ron Silinskie	John Healy	Rank & Rate	4/23/2015	Northeast Design Team was selected due to ability to outsource and increased efficiency potential. Work will be absorbed and/or outsourced.	1227299	Atkinson, William	Engr III Spec-Ntwk Eng	7	Joseph Marzello
Individual Case	Gary Small	Gary Small	Rank & Rate	4/23/2015	OS1 Provisioning Team was selected due to increased efficiency potential and ability to outsource. Work will be absorbed and/or outsourced.	1207258	McCue, Melissa	Engr III Spec-Ntwk Eng	7	Joseph Marzello
Individual Case	Gary Small	Gary Small	Rank & Rate	4/23/2015	OS1 Provisioning Team was selected due to increased efficiency potential and ability to outsource. Work will be absorbed and/or outsourced.	1162870	Messick Jr, William	Engr III Spec-Ntwk Eng	7	Joseph Marzello
Individual Case	Gary Small	Gary Small	Rank & Rate	4/23/2015	OS1 Provisioning Team was selected due to increased efficiency potential and ability to outsource. Work will be absorbed and/or outsourced.	1148816	Winicki, Norman	Engr III Spec-Ntwk Eng	7	Joseph Marzello
Individual Case	Meg Lose	Meg Lose	Rank & Rate	4/23/2015	This reduction in the ICF team is due to expected expense savings; work will be absorbed.	1353559	Wink, Thomas	Prim Eng-Ntwk Eng	6	Joseph Marzello
Individual Case	Pat McCouch	Pat McCouch	Rank & Rate	4/23/2015	Center Engineer Team selected due to expected expense savings; work will be absorbed.	1087649	Low Sr, Ronald	Engr III Spec-Ntwk Eng	7	Joseph Marzello
Individual Case	Jim Stewczyk	Jim Stewczyk	Rank & Rate	4/23/2015	FTP Team selected due to increased efficiency potential; work will be absorbed or contracted out.	1367017	Braun, Leon Paul	Engr III Spec-Ntwk Eng	7	Joseph Marzello

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Combined Cindy S	Cindy Swappert/Cindy Swappert/Heise	Rank & Rate	4/23/2015	Right of Way engineers are being downsized due to expense savings and ability to outsource. Work will be absorbed and/or outsourced.	1401782	Greese, Glenn	Eng III Spec-Ntwk Eng	7	Joseph Marcillo
Combined Cindy S	Cindy Swappert/Heise/Cindy Swappert/Heise	Individual Elimination	4/23/2015	Third party function was selected due to the ability to be outsourced.	1341838	Johns, Darrin	Eng III Spec-Ntwk Eng	7	Joseph Marcillo
Individual Case	Brian Magee	Rank & Rate	4/23/2015	Philadelphia Design Team was selected due to ability to outsource and potential for increased efficiency. Work will be absorbed and/or outsourced.	1197215	Walker, Suzanne	Eng III Spec-Ntwk Eng	7	Joseph Marcillo
Individual Case	John Nealy	Rank & Rate	4/23/2015	Pittsburgh Design Team was selected due to ability to outsource. Work will be absorbed and/or outsourced.	1195464	Browning, Charles	Eng III Spec-Ntwk Eng	7	Joseph Marcillo
Individual Case	Douglas J Smith	Rank & Rate	4/23/2015	Planning Team selected due to increased efficiency potential. Work will be absorbed.	1255728	Driver, Andy	Eng III Coll-Ntwk Eng	7	Joseph Marcillo

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Exhibit SS

Condensed Transcript
Testimony of:

MELISSA PARKER

Date: August 24, 2016

Suzette Walker v. Verizon Services Corporation, et al.

No.: USDC E.D.PA 15-4031

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MELISSA PARKER

Pages 1 to 4

<p style="text-align: right;">1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA</p> <p>3 * * *</p> <p>4 SUZETTE WALKER :</p> <p> :</p> <p>5 v. :</p> <p> :</p> <p>6 VERIZON SERVICES CORPORATION :</p> <p> and :</p> <p>7 VERIZON PENNSYLVANIA, INC. : NO. 15-4031</p> <p>8</p> <p>9 * * *</p> <p>10 August 24, 2016</p> <p>11 * * *</p> <p>12</p> <p>13 Oral deposition of MELISSA PARKER,</p> <p>14 held in the Law Offices of Karpf, Karpf &</p> <p>15 Cerutti, PC, 3331 Street Road, Two Greenwood</p> <p>16 Square, Suite 128, Bensalem, Pennsylvania</p> <p>17 19020, commencing at 12:07 p.m., on the above</p> <p>18 date, before Hope Agosto, a Professional Court</p> <p>19 Reporter and a Notary Public.</p> <p>20</p> <p>21 * * *</p> <p>22 R&K REPORTING</p> <p>23 Court Reporting Services</p> <p>24 PO Box 1372</p> <p> Levittown, Pennsylvania 19058-1372</p> <p> Phone (215) 946-7009 Fax (215) 949-1867</p>	<p style="text-align: right;">3</p> <p>1 * * *</p> <p>2 INDEX</p> <p>3 * * *</p> <p>4 WITNESS PAGE NO.</p> <p>5 MELISSA PARKER</p> <p>6 By Ms. Burke 4</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11 * * *</p> <p>12 EXHIBITS</p> <p>13 * * *</p> <p>14 NO. DESCRIPTION PAGE NO.</p> <p>15 Parker-1 3/31/15 Email from Parker re: 11</p> <p> FW: RIF Business Cases</p> <p>16</p> <p>17 Parker-2 Severance Process for Management 16</p> <p> Employees - Manager Job Aid</p> <p>18 (MARKED DURING PREVIOUS DEPOSITIONS)</p> <p>19 Verizon-14 Rate and Rank RIF Documents 16</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">2</p> <p>1 A P P E A R A N C E S:</p> <p>2</p> <p>3 KARPF, KARPf & CERUTTI, PC</p> <p>4 BY: CHRISTINE E. BURKE, ESQUIRE</p> <p> 3331 Street Road</p> <p> Two Greenwood Square</p> <p>5 Suite 128</p> <p> Bensalem, Pennsylvania 19020</p> <p>6 (215) 639-0801</p> <p> CBurke@karpf-law.com</p> <p>7 -- Counsel for the Plaintiff</p> <p>8</p> <p>9 REED SMITH, LLP</p> <p>10 BY: JOEL S. BARRAS, ESQUIRE</p> <p> Three Logan Square</p> <p>11 1717 Cherry Street</p> <p> Suite 3100</p> <p> Philadelphia, Pennsylvania 19103</p> <p>12 (215) 241-7990</p> <p> JBarras@reedsmith.com</p> <p>13 -- Counsel for the Defendants</p> <p>14</p> <p>15</p> <p>16 A L S O P R E S E N T:</p> <p>17 HARVETTA NERO, ESQUIRE</p> <p>18 -- Assistant General Counsel, Verizon</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">4</p> <p>1 * * *</p> <p>2 (It is hereby stipulated and</p> <p>3 agreed by and between counsel for the</p> <p>4 respective parties that the signing,</p> <p>5 sealing, filing and certification are</p> <p>6 waived; and that all objections, except</p> <p>7 as to the form of the question, be</p> <p>8 reserved until the time of trial.)</p> <p>9 * * *</p> <p>10 MELISSA PARKER, after having been</p> <p>11 first duly sworn, was examined and</p> <p>12 testified as follows:</p> <p>13 * * *</p> <p>14 EXAMINATION</p> <p>15 * * *</p> <p>16 BY MS. BURKE:</p> <p>17 Q. Ms. Parker, I'm here to take your</p> <p>18 deposition today because you have been</p> <p>19 identified by the parties as someone who may</p> <p>20 have discoverable information related to the</p> <p>21 case. Okay?</p> <p>22 A. Yes.</p> <p>23 Q. I represent Suzette Walker in a civil</p> <p>24 lawsuit that she's brought against her former</p>

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MELISSA PARKER

Pages 5 to 8

<p style="text-align: right;">5</p> <p>1 employer, Verizon, and it's a question and 2 answer session but it is under oath. Do you 3 understand that? 4 A. Yes. 5 Q. Have you ever had your deposition 6 taken before? 7 A. No. 8 Q. Hope is typing down every single 9 thing that you say and anything that I or your 10 counsel say, so just make sure that you keep 11 your responses verbal. If you say uh-huh or 12 uh-uh or you nod, your response won't be 13 accurately reflected on the record so we'll 14 remind you. Okay? 15 A. Okay. 16 Q. You may hear your counsel make 17 objections. Most importantly, if you hear him 18 object, you have to stop testifying so he can, 19 A, put his objection on the record -- some 20 witnesses like to keep going -- and B, Hope can 21 only type what one person is saying at a time. 22 All right? 23 A. Yep. 24 Q. So if you hear my question and you</p>	<p style="text-align: right;">7</p> <p>1 A. Yes. 2 Q. What's your title right now? 3 A. Senior manager, HR business partner. 4 Q. Do you have a physical office 5 location that you work out of? 6 A. Basking Ridge, One Verizon way. 7 Q. Did you come from there today? 8 A. No. 9 Q. Did you come right from home? 10 A. Yes. 11 Q. How long have you held that title, 12 ma'am? 13 A. Since October 2013. 14 Q. Have your job duties been fairly 15 consistent since October 2013 through the 16 present? 17 A. Yes. 18 Q. Have you always worked out of the 19 Basking Ridge location since October of 2013 to 20 the present? 21 A. Yes. 22 Q. What are your job responsibilities as 23 a senior manager HR business partner? 24 A. I manage a team of business partners,</p>
<p style="text-align: right;">6</p> <p>1 think you know where I'm going, just wait for 2 me to answer so there's a clear question on the 3 record. I'll try not to interrupt you as well 4 during the course of your answers. All right? 5 If I ask you a question and you don't 6 understand for some reason, you'd like me to 7 clarify or repeat, just let me know. Nobody 8 wants you to guess about things that you don't 9 know. These events didn't happen yesterday so 10 if you don't recall, you can tell me you don't 11 recall. If there's an answer that you don't 12 know because you never knew, you can tell me 13 that as well. Okay? 14 A. Yes. 15 Q. If I give you a document, you take 16 time to look at it before you answer any 17 questions. I'm hoping to expedite your 18 deposition and get you out of here as soon as 19 possible, but if you need a break, you can let 20 us know that and we'll go off the record, but I 21 just ask that you answer the question that's 22 pending before you leave the room. Okay? 23 A. Okay. 24 Q. Are you still an employee of Verizon?</p>	<p style="text-align: right;">8</p> <p>1 as well as have any own clients. 2 Q. Clients that you're directly 3 responsible for, have they been the same since 4 October of 2013 or they've changed in some way? 5 A. The clients that I'm responsible for 6 have been the same since 2013. 7 Q. Which clients are you directly 8 responsible for? 9 A. The Maureen Davis organization. 10 Q. Where is that located or what area 11 does it cover? 12 A. She covers the dispatch operations 13 organization. The organization itself has gone 14 through a lot of reorganization. Right now 15 that's what she covers. 16 Q. You have been directly responsible 17 for Ms. Davis' organization? 18 A. Yes, I have. 19 Q. Since October of 2013? 20 A. Yes. 21 Q. And how many HR business partners do 22 you oversee? 23 A. Three. 24 Q. What are their names?</p>

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MELISSA PARKER

Pages 9 to 12

<p style="text-align: right;">9</p> <p>1 A. Right now, Marissa Ruggario, Cynthia 2 Barrett and Alejandra Rosales. 3 Q. Has that changed at all since 2013? 4 A. Yes. 5 Q. How? 6 A. We've gone through several 7 reorganizations from a client perspective, so 8 my director and I have changed the team around 9 depending on the support needed within the 10 organization. 11 Q. Who is your director? 12 A. Jason Sakowski. 13 Q. Has he been your director since 14 October of 2013? 15 A. Yes. 16 Q. Other than the two RIF notification 17 dates in early May of 2015, have you been 18 involved in any other RIFs for the 19 organization? 20 A. Yes. 21 Q. I want to focus your attention today 22 on the RIFs that occurred in the spring of 2015 23 for the organization. Okay? 24 A. Yes.</p>	<p style="text-align: right;">11</p> <p>1 Q. Are you aware of any others besides 2 one in April and one in May? 3 A. Not that I recall. 4 Q. But you do recall those two 5 particular months at issue? 6 A. Yes. 7 Q. In terms of preliminary assessments 8 of how many individuals may, in fact, be 9 impacted or what the percentage of reduction 10 needs to be for each particular area, were you 11 involved in that? 12 A. No. 13 Q. Do you know who, if anyone, would be 14 involved in that for your organization? 15 A. It typically would come from the 16 executive vice president, Bob Mudge, through 17 his chain of hierarchy, then to my management 18 team, to the best of my knowledge. 19 * * * 20 (Whereupon, Exhibit Parker-1 was 21 marked for identification.) 22 * * * 23 BY MS. BURKE: 24 Q. Ms. Parker, I'm handing you an email</p>
<p style="text-align: right;">10</p> <p>1 Q. You're aware that various RIFs 2 occurred within the engineering department at 3 least under Joe Muccilo or he was under Bill 4 Bragg? 5 A. Yes. 6 Q. Do you know who that is? 7 A. Yes. 8 Q. Both of those individuals? 9 A. Yes. 10 Q. Other than that arena, where else, if 11 at all, within Verizon were there RIFs 12 occurring in the spring of 2015? 13 A. In spring of in 2015, the RIFs that 14 our organization was responsible for was under 15 Bob Mudge, who is the executive vice president, 16 so that would be the network operations 17 organization. 18 Q. Under Bob Mudge? 19 A. Yes. 20 Q. Were there any more than two specific 21 notification dates in the spring of 2015? 22 A. I'm not sure specifically. 23 Q. Were there as many as ten? 24 A. No.</p>	<p style="text-align: right;">12</p> <p>1 Bates stamped DEF Walker 2649 to 2650. Those 2 are the numbers in the bottom right-hand 3 corner, just for your reference. This is an 4 email dated March 21st, 2015 it appears to be 5 from you to various Verizon employees. Take a 6 moment to take a look at it and let me know 7 when you're ready. 8 A. Okay. 9 Q. Is this an email that you drafted? 10 A. Yes. 11 Q. Now, Mike Pescatore, who is that? 12 A. He performed a staff function under 13 Bill Bragg. 14 Q. What about Tom Sisk, who is that? 15 A. Tom Sisk is a director that reported 16 to Bill Bragg. 17 Q. Who is Edward O'Donoghue? 18 A. He is also a director that reported 19 to Bill. 20 Q. So did you have a call with all the 21 recipients on this email, including Mike 22 Pescatore? 23 A. Yes. 24 Q. Bill Bragg, Ed O'Donoghue, Joe</p>

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MELISSA PARKER

Pages 13 to 16

<p style="text-align: right;">13</p> <p>1 Muccilo, Tom Sisk?</p> <p>2 A. Yes.</p> <p>3 Q. I have provided Mike with the</p> <p>4 template to submit employee names to me so that</p> <p>5 I can create the cases for you. Please try to</p> <p>6 have these to me by close of business tomorrow,</p> <p>7 if possible, no later than Thursday, to ensure</p> <p>8 that your teams will have enough time to</p> <p>9 complete the cases in the system.</p> <p>10 Is your computer on, ma'am?</p> <p>11 A. No.</p> <p>12 Q. Shake a mouse and see if that works.</p> <p>13 A. (Witness complies with request.)</p> <p>14 Q. This is the attachment to this email.</p> <p>15 Do you agree with that?</p> <p>16 A. Yes.</p> <p>17 Q. You say, I have provided Mike with</p> <p>18 the template to submit employee names to me so</p> <p>19 that I can create the cases for you.</p> <p>20 Let me make sure I'm on the same page</p> <p>21 as you. This says HR VP use only. Did you</p> <p>22 make this up yourself, this template?</p> <p>23 A. No.</p> <p>24 Q. Just something you had previously</p>	<p style="text-align: right;">15</p> <p>1 that provides instructions on how to rate and</p> <p>2 rank or how to do a business case in the</p> <p>3 system, and so they would be following the</p> <p>4 instructions on how to do that in tandem of</p> <p>5 filling out and providing us the information on</p> <p>6 the spreadsheet.</p> <p>7 MS. BURKE: Can you read back her</p> <p>8 response, please, Hope?</p> <p>9 * * *</p> <p>10 (Whereupon, the court reporter</p> <p>11 read back the pertinent testimony.)</p> <p>12 * * *</p> <p>13 BY MS. BURKE:</p> <p>14 Q. So when you say supply the names,</p> <p>15 they can't do that until after they do the</p> <p>16 proper rate and rank though, correct?</p> <p>17 A. If they followed the instructions on</p> <p>18 the job aid.</p> <p>19 Q. Now, the job aid, are you talking</p> <p>20 about the substance of this email or something</p> <p>21 in a particular spreadsheet?</p> <p>22 A. Substance of the email. It was an</p> <p>23 attachment to the email.</p> <p>24 Q. You're not talking about this, are</p>
<p style="text-align: right;">14</p> <p>1 created in the system or had access to?</p> <p>2 A. Somebody on the team did it just as a</p> <p>3 tool to gather information.</p> <p>4 Q. Where in the form did you want him to</p> <p>5 submit employee names?</p> <p>6 A. In column H, I and J.</p> <p>7 Q. Did anyone, in fact, utilize your</p> <p>8 template and identify the names?</p> <p>9 A. Yes.</p> <p>10 Q. Put in the spreadsheet that you asked</p> <p>11 for?</p> <p>12 A. Yes.</p> <p>13 Q. Where do you keep that?</p> <p>14 A. On our hard drive.</p> <p>15 Q. You're providing Mike with a template</p> <p>16 to submit employee names to me. What kind of</p> <p>17 employee names?</p> <p>18 A. The employee names that they</p> <p>19 determined would be impacted within their</p> <p>20 organization.</p> <p>21 Q. Now, was that before or after they</p> <p>22 were ranked with you or one of your HR business</p> <p>23 partners?</p> <p>24 A. The email contains also a job aid</p>	<p style="text-align: right;">16</p> <p>1 you? (Indicating.)</p> <p>2 A. Yes, I am.</p> <p>3 MS. BURKE: We'll mark this then.</p> <p>4 * * *</p> <p>5 (Whereupon, Exhibit Parker-2 was</p> <p>6 marked for identification.)</p> <p>7 * * *</p> <p>8 BY MS. BURKE:</p> <p>9 Q. Now, when you say send me the names</p> <p>10 so I can create the cases, before we even get</p> <p>11 to the case, them sending you the name would</p> <p>12 involve them following the manager job aid you</p> <p>13 sent and rate and ranking the employees?</p> <p>14 A. Correct.</p> <p>15 Q. Then only at that time do you even</p> <p>16 create a business case in the system?</p> <p>17 A. That's correct.</p> <p>18 Q. This has been previously marked as</p> <p>19 Verizon-14. It's a collection of various RIF</p> <p>20 documents, but the very first page 1 of 2</p> <p>21 identifies create managed business case. Do</p> <p>22 you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Is this a screen shot of a particular</p>

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Pages 17 to 20

<p style="text-align: right;">17</p> <p>1 business case?</p> <p>2 A. Yes.</p> <p>3 Q. Who, if anyone, fills out the actual</p> <p>4 information within the screen for the business</p> <p>5 case?</p> <p>6 A. This particular screen is what you're</p> <p>7 asking me about?</p> <p>8 Q. Sure, we'll start with that one.</p> <p>9 A. This particular screen is filled out</p> <p>10 by the HR business partner. It's also updated</p> <p>11 at some point by the subject matter expert, our</p> <p>12 SME contact, to ensure the wording on the</p> <p>13 screen is appropriate for that particular RIF</p> <p>14 notification.</p> <p>15 Q. Your SME, is that an attorney?</p> <p>16 A. No. Well, it's somebody internal in</p> <p>17 the HR business partner organization who does</p> <p>18 work with an attorney, yes.</p> <p>19 Q. I just want to go to an example of</p> <p>20 one that did you. If you could to Page 787,</p> <p>21 there's an HRBP and it says Melissa Parker. Do</p> <p>22 you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Then there's an HRBP manager. Do you</p>	<p style="text-align: right;">19</p> <p>1 Q. Now, other than them inputting the</p> <p>2 employee name, are you asking anyone else to</p> <p>3 fill out any of these areas?</p> <p>4 A. The client fills out the entire</p> <p>5 spreadsheet except for the first column.</p> <p>6 Q. B through M?</p> <p>7 A. Yes.</p> <p>8 Q. So you have a completed version of</p> <p>9 this somewhere?</p> <p>10 A. Yes.</p> <p>11 Q. Based on them following the</p> <p>12 instructions, they were only supposed to</p> <p>13 provide you with names after they had done a</p> <p>14 proper rate and rank, correct?</p> <p>15 A. Yes.</p> <p>16 Q. The justification, is that just</p> <p>17 absorbed, redistributed or eliminated, or is</p> <p>18 that an explanation of why that particular</p> <p>19 employee would, in fact, be impacted?</p> <p>20 A. What column are you on?</p> <p>21 Q. G, I'm sorry.</p> <p>22 A. It would be an explanation of why the</p> <p>23 organization was eliminating the position.</p> <p>24 Q. Can you go to Page 787 in your</p>
<p style="text-align: right;">18</p> <p>1 see that?</p> <p>2 A. Yes.</p> <p>3 Q. That's who you identified earlier</p> <p>4 that you report to, right, Jason?</p> <p>5 A. Correct.</p> <p>6 Q. If your name is identified in the</p> <p>7 particular document as the HRBP, does that mean</p> <p>8 you completed this particular business case?</p> <p>9 A. Yes.</p> <p>10 Q. Did you do all the business cases for</p> <p>11 Joe Muccilo's organization because someone else</p> <p>12 was out on leave?</p> <p>13 A. Yes.</p> <p>14 Q. I just wanted to be sure we were on</p> <p>15 the right page about what constituted the</p> <p>16 business case. You can put Verizon-14 aside</p> <p>17 for a moment. I want to focus on this email</p> <p>18 that you sent out.</p> <p>19 A. (Witness complies with request.)</p> <p>20 Q. I have provided Mike with the</p> <p>21 template to submit employee names to me so I</p> <p>22 can create the cases for you. Do you still</p> <p>23 have the template up on your screen?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">20</p> <p>1 business case packet, which is Verizon-14?</p> <p>2 A. (Witness complies with request.)</p> <p>3 Q. Are you there?</p> <p>4 A. Uh-huh.</p> <p>5 Q. Sorry, you have to say yes or no out</p> <p>6 loud.</p> <p>7 A. Yes.</p> <p>8 Q. The area that identifies comments, is</p> <p>9 that something that you entered?</p> <p>10 MR. BARRAS: What area are you</p> <p>11 referring to?</p> <p>12 BY MS. BURKE:</p> <p>13 Q. The very bottom that identifies</p> <p>14 comments, center engineering group, work with</p> <p>15 Turk vendors and prepare price quotes. Ron has</p> <p>16 expressed a willingness to leave.</p> <p>17 A. Typically, the organization will put</p> <p>18 in a reasoning in there and if we need to add</p> <p>19 anything as a business partner, then we can add</p> <p>20 comments as well.</p> <p>21 Q. Did you draft this particular</p> <p>22 comment?</p> <p>23 A. The part where it says Ron has a</p> <p>24 willing expressed a willingness to leave, I</p>

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Pages 21 to 24

<p style="text-align: right;">21</p> <p>1 would have added that.</p> <p>2 Q. But the first sentence, where did you</p> <p>3 get that from?</p> <p>4 A. I don't recall.</p> <p>5 Q. You had referenced --</p> <p>6 MS. BURKE: Can you read back her</p> <p>7 last response where she said</p> <p>8 director?</p> <p>9 * * *</p> <p>10 (Whereupon, the court reporter</p> <p>11 read back the pertinent testimony.)</p> <p>12 * * *</p> <p>13 BY MS. BURKE:</p> <p>14 Q. That first sentence in the comments</p> <p>15 box, when you say the organization, do you mean</p> <p>16 the actual selection manager, Patricia McCoach,</p> <p>17 or do you mean the director in this particular</p> <p>18 substance?</p> <p>19 A. The person that is completing the</p> <p>20 business case, which typically is the selection</p> <p>21 manager.</p> <p>22 Q. So they typically fill out the</p> <p>23 comments area and if you feel it's necessary,</p> <p>24 you add something?</p>	<p style="text-align: right;">23</p> <p>1 Q. I'm not asking for any conversations</p> <p>2 that were had with legal. Does every case get</p> <p>3 discussed with legal?</p> <p>4 A. Not always.</p> <p>5 Q. At what point did you determine when</p> <p>6 you were going to discuss a case with legal?</p> <p>7 A. We provide legal with the knowledge</p> <p>8 that the case is ready for review, make time</p> <p>9 with them if they feel discussion is needed.</p> <p>10 However, they have the option to approve the</p> <p>11 case if they don't feel that any additional</p> <p>12 discussion is needed on a particular case.</p> <p>13 Q. Do you make a record of that</p> <p>14 somewhere if you do have, in fact, have</p> <p>15 discussion with legal?</p> <p>16 A. No.</p> <p>17 Q. Is that a telephone discussion</p> <p>18 between you and the attorney?</p> <p>19 A. Yes, or in person if they're</p> <p>20 available.</p> <p>21 Q. Do you bring in the selection manager</p> <p>22 for that discussion as well or is that</p> <p>23 something that you handle?</p> <p>24 A. Typically, it's between the business</p>
<p style="text-align: right;">22</p> <p>1 A. Correct.</p> <p>2 Q. If there is nothing in the comments</p> <p>3 area, why would that be?</p> <p>4 A. I don't know.</p> <p>5 Q. Just use Page 781 as an example.</p> <p>6 A. I don't recall.</p> <p>7 Q. May that be because there was no</p> <p>8 commentary provided by that particular</p> <p>9 selection manager?</p> <p>10 A. It could be.</p> <p>11 Q. If they did provide comments, would</p> <p>12 you include them?</p> <p>13 A. They would have included them.</p> <p>14 Q. So where are you pulling the comments</p> <p>15 from, this particular spreadsheet that was</p> <p>16 completed?</p> <p>17 A. I'm not entering the comments in</p> <p>18 typically.</p> <p>19 Q. Who enters them?</p> <p>20 A. Like I stated before, it's typically</p> <p>21 the selection manager that would do that.</p> <p>22 Q. Actually goes into the system and</p> <p>23 inputs the comments?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">24</p> <p>1 partner and the attorney. The selection</p> <p>2 manager can be brought into the discussion if</p> <p>3 necessary.</p> <p>4 Q. Respecting Suzette Walker, was an</p> <p>5 attorney brought in on her business case?</p> <p>6 MR. BARRAS: Objection.</p> <p>7 THE WITNESS: Yes.</p> <p>8 MR. BARRAS: Objection. We're</p> <p>9 getting into privileged</p> <p>10 communications.</p> <p>11 MS. BURKE: There's no</p> <p>12 communications at all being</p> <p>13 discussed. It's whether or not an</p> <p>14 attorney was consulted respecting</p> <p>15 Suzette Walker.</p> <p>16 THE WITNESS: Can you restate the</p> <p>17 question?</p> <p>18 BY MS. BURKE:</p> <p>19 Q. For all these business cases that</p> <p>20 we're discussing -- are you on the same page as</p> <p>21 me?</p> <p>22 A. Yes.</p> <p>23 Q. I want to make sure you're following</p> <p>24 me. Sometimes an attorney would actually give</p>

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Pages 25 to 28

<p style="text-align: right;">25</p> <p>1 input and sometimes an attorney would not, 2 correct? 3 A. Correct. 4 Q. Did you send every single case to the 5 attorney for review? 6 A. Yes. 7 Q. So no matter what case is in this 8 packet, you sent it to legal for review? 9 A. Correct. 10 Q. Did you get feedback from legal on 11 every single case? 12 A. Not always. 13 Q. Do you know if you got any feedback 14 on Suzette Walker? 15 MR. BARRAS: Objection. That is 16 privileged. 17 MS. BURKE: She either did or she 18 didn't. 19 MR. BARRAS: She just testified 20 that sometimes she got feedback, 21 sometimes she did not. Therefore, 22 the fact that she got feedback at all 23 is privileged. 24 MS. BURKE: There's no privileged</p>	<p style="text-align: right;">27</p> <p>1 THE WITNESS: No. 2 BY MS. BURKE: 3 Q. Just you and legal, ma'am? 4 A. Yes. 5 Q. These business cases that you draft, 6 what do you do with them once they're 7 completed? 8 A. Can you restate the question? 9 Q. Once a business case is completed, 10 what, if anything, do you do with it? 11 A. Completed meaning? 12 Q. Fill out all the information, you 13 send it to the director, right? 14 A. Yes. 15 Q. And it gets a case number? 16 A. Correct. 17 Q. Then what system does it go into? 18 A. The internal severance system. 19 Q. The what? 20 A. The internal severance system. 21 Q. Is that where these screen shots are 22 pulled from? 23 A. Yes. 24 Q. The advice, if any, that you obtain</p>
<p style="text-align: right;">26</p> <p>1 communication. She hasn't even 2 identified if such communication was 3 had. If she didn't have any 4 communications or feedback from 5 legal, then there's no privilege to 6 invoke. I'm just asking her if she 7 did, in fact, get feedback. There's 8 no privileged communication to be 9 shared in answering that question. 10 MR. BARRAS: We have an objection 11 to the question. You can answer 12 whether or not you discussed the case 13 with legal. 14 THE WITNESS: Yes. 15 BY MS. BURKE: 16 Q. And who was present? Was Brian Magee 17 present? 18 MR. BARRAS: Objection. 19 BY MS. BURKE: 20 Q. Was Brian Magee present? 21 A. No. 22 Q. Was Joe Muccilo present? 23 MR. BARRAS: Objection. You can 24 answer.</p>	<p style="text-align: right;">28</p> <p>1 from counsel in connection with the RIF cases, 2 do you memorialize that somewhere? 3 MR. BARRAS: Objection. It would 4 be work product if she did, it's 5 privileged. 6 BY MS. BURKE: 7 Q. Do you memorialize it anywhere? 8 MR. BARRAS: I'm going to object. 9 Don't answer that. We're getting 10 into privilege and work product. 11 MS. BURKE: We're not getting 12 into anything that's privileged. 13 First of all, she's not an attorney 14 so she can't create work product. 15 I'm asking if she, after getting 16 advice from the attorney, 17 memorialized it somewhere. 18 MR. BARRAS: Right, did she 19 memorialized privileged 20 communications? 21 MS. BURKE: How is that 22 privileged in any fashion if she 23 actually wrote it down somewhere? 24 I'm not asking what she said or what</p>

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Pages 29 to 32

<p style="text-align: right;">29</p> <p>1 it includes.</p> <p>2 MR. BARRAS: Well, then it's</p> <p>3 irrelevant.</p> <p>4 MS. BURKE: No, it's not</p> <p>5 irrelevant because you guys have</p> <p>6 claimed privilege in a particular</p> <p>7 document and I believe that it's</p> <p>8 inappropriate.</p> <p>9 MS. NERO: She's memorializing</p> <p>10 guidance that was given at the</p> <p>11 direction of counsel.</p> <p>12 MS. BURKE: No, I'm not.</p> <p>13 What was my last question so we</p> <p>14 can preserve the record?</p> <p>15 * * *</p> <p>16 (Whereupon, the court reporter</p> <p>17 read back the pertinent testimony.)</p> <p>18 * * *</p> <p>19 MS. BURKE: So you're instructing</p> <p>20 her not to answer?</p> <p>21 MR. BARRAS: You're talking about</p> <p>22 the one document -- can we go off the</p> <p>23 record for a moment?</p> <p>24 MS. BURKE: No. I'm not even</p>	<p style="text-align: right;">31</p> <p>1 moment.</p> <p>2 * * *</p> <p>3 (Whereupon, there was an</p> <p>4 off-the-record discussion.)</p> <p>5 * * *</p> <p>6 BY MS. BURKE:</p> <p>7 Q. You still have Verizon-14 in front of</p> <p>8 you, right?</p> <p>9 A. Yes.</p> <p>10 Q. Just to be clear, let's just use the</p> <p>11 first one as an example, okay. Are you on Page</p> <p>12 755?</p> <p>13 A. Yes.</p> <p>14 Q. This particular document that we're</p> <p>15 looking at a screen shot of is the internal</p> <p>16 severance system; it's a program?</p> <p>17 A. It's the system that we use to put</p> <p>18 severance cases in, yes.</p> <p>19 Q. Now, the tab that identifies rate and</p> <p>20 rank employees, is that reflective of Walker</p> <p>21 757, if you flip two pages?</p> <p>22 A. The rate -- this is not the rate and</p> <p>23 rank tab. This is the result of what was</p> <p>24 inputted on the tab.</p>
<p style="text-align: right;">30</p> <p>1 talking about that. I'm just asking</p> <p>2 you if you're instructing her not to</p> <p>3 answer if when she did, in fact,</p> <p>4 speak with counsel, she memorialized</p> <p>5 it anywhere, that's the question.</p> <p>6 MR. BARRAS: I'm instructing her</p> <p>7 not to answer whether or not she</p> <p>8 memorialized those privileged</p> <p>9 comments from counsel.</p> <p>10 MS. BURKE: You don't want her to</p> <p>11 answer the question?</p> <p>12 MR. BARRAS: Correct. If you'd</p> <p>13 like to go off the record and talk</p> <p>14 about the one document that you</p> <p>15 emailed me about, I'd be happy to do</p> <p>16 that.</p> <p>17 MS. BURKE: No, I don't want to</p> <p>18 talk about it off the record.</p> <p>19 Ma'am, I'm going to ask you to</p> <p>20 step out really quick while your</p> <p>21 counsel and I contact the judge.</p> <p>22 (Whereupon, the witness left the</p> <p>23 room.)</p> <p>24 MR. BARRAS: Off the record for a</p>	<p style="text-align: right;">32</p> <p>1 Q. Now, the employee names that you were</p> <p>2 provided in your spreadsheet, do you still have</p> <p>3 that in front of you, ma'am? In what format</p> <p>4 did they fill out or rank their employees?</p> <p>5 A. I don't know.</p> <p>6 Q. So this document that you are looking</p> <p>7 at here that's in Verizon-14, that's Walker</p> <p>8 757?</p> <p>9 A. Yes.</p> <p>10 Q. Who fills this out in terms of the</p> <p>11 comments area?</p> <p>12 A. What page are you on again?</p> <p>13 Q. 757.</p> <p>14 A. This information as far as the</p> <p>15 comments is filled out by the selection</p> <p>16 manager.</p> <p>17 Q. Do they actually type it into the</p> <p>18 system?</p> <p>19 A. Yes.</p> <p>20 Q. Does that happen though before step</p> <p>21 two, before you even create a business case?</p> <p>22 A. In the system?</p> <p>23 Q. Yes.</p> <p>24 A. A business case has to be created in</p>

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Pages 33 to 36

<p style="text-align: right;">33</p> <p>1 the system and then the manager adds their</p> <p>2 comments to the system. There has to be a</p> <p>3 numeric value for them to reference in order</p> <p>4 for them to input the comments.</p> <p>5 Q. So step one, consolidating the names</p> <p>6 on the spreadsheet, do they do an informal</p> <p>7 method of rate and ranking before they gave the</p> <p>8 names to you?</p> <p>9 A. I don't know.</p> <p>10 Q. You never saw it?</p> <p>11 A. No.</p> <p>12 Q. So you get a list of names, right?</p> <p>13 A. Yes.</p> <p>14 Q. You create a business case, right?</p> <p>15 A. Yes.</p> <p>16 Q. Which gives them the ability to go in</p> <p>17 and input numerical scores?</p> <p>18 A. Correct.</p> <p>19 Q. Let's look at Walker 759 as an</p> <p>20 example.</p> <p>21 A. Okay.</p> <p>22 Q. The numerical scores here, the ones</p> <p>23 for performance or corrective action, are they</p> <p>24 automatically generated through the system?</p>	<p style="text-align: right;">35</p> <p>1 A. A 1 to 5.</p> <p>2 Q. Well, corrective action, there's a</p> <p>3 zero there, right?</p> <p>4 A. Because there was none.</p> <p>5 Q. So the numbers could range from zero</p> <p>6 of 5 to be reflected on the screen?</p> <p>7 A. Yes.</p> <p>8 Q. All the commentary that's reflected,</p> <p>9 again, we're just using 757 as an example, you</p> <p>10 didn't type up any of this?</p> <p>11 A. It would be inputted by the manager</p> <p>12 if there was any corrections or discussion</p> <p>13 where they needed to make a correction, we</p> <p>14 would have the ability to do that in the system</p> <p>15 with them. The initial input is inputted by</p> <p>16 the manager.</p> <p>17 Q. Page 795, this is a rate and rank or</p> <p>18 a reduction in information employer rating form</p> <p>19 for Brian Magee's team?</p> <p>20 A. Yes.</p> <p>21 Q. Did you input all this commentary on</p> <p>22 here, if any, or did Mr. Magee do that?</p> <p>23 A. Mr. Magee.</p> <p>24 Q. You're saying after a business case</p>
<p style="text-align: right;">34</p> <p>1 A. For corrective action?</p> <p>2 Q. Yes.</p> <p>3 A. I don't believe so.</p> <p>4 Q. How are those numbers generated then?</p> <p>5 A. I believe managers can add that.</p> <p>6 Q. The performance scores, are those</p> <p>7 automatically generated through the system?</p> <p>8 A. Yes.</p> <p>9 MR. BARRAS: When you say</p> <p>10 performance, are you talking about</p> <p>11 the performance evaluation for 2013,</p> <p>12 2014?</p> <p>13 MS. BURKE: On Page 759 it says</p> <p>14 2014 and 2015.</p> <p>15 MR. BARRAS: The 6 and 7 column.</p> <p>16 THE WITNESS: So under 2014 and</p> <p>17 2015 performance, that's generated</p> <p>18 automatically by the system.</p> <p>19 BY MS. BURKE:</p> <p>20 Q. But every other column for a</p> <p>21 numerical area you're saying the manager would</p> <p>22 input that number?</p> <p>23 A. That's correct.</p> <p>24 Q. From a zero to a 5?</p>	<p style="text-align: right;">36</p> <p>1 was generated, that gave him the ability to go</p> <p>2 into the system and then type in the comments</p> <p>3 that he wanted?</p> <p>4 A. That's correct.</p> <p>5 Q. Do you know why a business case was</p> <p>6 not created for Mr. Gross?</p> <p>7 A. No.</p> <p>8 Q. Did you have any discussions with</p> <p>9 Muccilo or any other members of management</p> <p>10 about why a business case was not created for</p> <p>11 Mr. Gross?</p> <p>12 A. No, I did not.</p> <p>13 Q. When you created the business case in</p> <p>14 the system, just for Suzette Walker as an</p> <p>15 example, which starts on Page 792. Do you see</p> <p>16 that?</p> <p>17 A. Yes.</p> <p>18 Q. Where did you obtain the other</p> <p>19 employees whom she was ranked against?</p> <p>20 A. You enter the job code on the first</p> <p>21 page in the middle and the peers underneath</p> <p>22 that manager automatically populate into the</p> <p>23 system.</p> <p>24 Q. Which page are you referring to? Can</p>

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<p style="text-align: right;">37</p> <p>1 you refer to Bates stamp numbers that you're</p> <p>2 referring to job code?</p> <p>3 A. On 792, it's directly in the middle</p> <p>4 of the page and it says job code, CTNGT2.</p> <p>5 Q. CTNGT2, is that for all engineering</p> <p>6 III specialists network engineering and ops, or</p> <p>7 is that just assigned to Magee?</p> <p>8 A. The job code would be populated based</p> <p>9 on the employees that roll up to Magee.</p> <p>10 Q. So does that number correlate to Mr.</p> <p>11 Magee then, his team only?</p> <p>12 A. Yes.</p> <p>13 Q. Next to it it just says engineering</p> <p>14 III specialist network, engineering and ops?</p> <p>15 A. Yes.</p> <p>16 Q. Is there a job code for Mr. Gross?</p> <p>17 A. He would have a job code.</p> <p>18 Q. Would he for his team?</p> <p>19 A. For the people who roll up to him,</p> <p>20 yes.</p> <p>21 Q. Right. Would he have a job code?</p> <p>22 A. Yes. Job codes are based on the</p> <p>23 individual, not his entire team.</p> <p>24 Q. You mean are based on the manager?</p>	<p style="text-align: right;">39</p> <p>1 A. I don't know.</p> <p>2 Q. We're back on Parker-1, the email.</p> <p>3 When you say based on our call yesterday, I</p> <p>4 have provided Mike with the template to submit</p> <p>5 employee names to me so that I can create a</p> <p>6 business case, what employee names are you</p> <p>7 talking about?</p> <p>8 A. The employee names that will be</p> <p>9 impacted on their team.</p> <p>10 Q. How would they know who is impacted</p> <p>11 if you have to create a business case which</p> <p>12 gives them the ability to go in and do all the</p> <p>13 column and all the scoring?</p> <p>14 A. Because as I stated before, they</p> <p>15 would be going through the job aid and</p> <p>16 following the instructions on how to select the</p> <p>17 employees on their team.</p> <p>18 Q. So once you create the business case,</p> <p>19 is it your testimony that literally all they're</p> <p>20 doing at that point is filling in the exact</p> <p>21 same information in the system that you've</p> <p>22 authorized them now to utilize?</p> <p>23 A. I don't understand question.</p> <p>24 Q. In order to get a name, they would</p>
<p style="text-align: right;">38</p> <p>1 A. I mean are based on the individual.</p> <p>2 Everyone could have a different job that they</p> <p>3 do under the same manager. They don't</p> <p>4 necessarily have just one job code for an</p> <p>5 entire team.</p> <p>6 Q. For this particular business case,</p> <p>7 how did you pick this job code?</p> <p>8 A. Because he provided it in the</p> <p>9 template back to me.</p> <p>10 Q. Who did, Mr. Magee?</p> <p>11 A. Yes.</p> <p>12 Q. Who assigns job codes?</p> <p>13 A. At the corporate level.</p> <p>14 Q. Just because I'm confused, when you</p> <p>15 say that there could be more than one job code</p> <p>16 per individual, is that what you said?</p> <p>17 A. No, it's by individual.</p> <p>18 Q. So Mr. Magee could have more than one</p> <p>19 job code assigned to him?</p> <p>20 A. Assigned to his team.</p> <p>21 Q. Based on what, do you know?</p> <p>22 A. Their job responsibilities.</p> <p>23 Q. Do you know if he did, in fact, have</p> <p>24 more than one job code assigned to his team?</p>	<p style="text-align: right;">40</p> <p>1 have to do the proper RIF criterion, right?</p> <p>2 Follow all these instructions in Exhibit</p> <p>3 Parker-2, right?</p> <p>4 A. That's the resource provided for them</p> <p>5 to do that, yes.</p> <p>6 Q. They're supposed to follow this and</p> <p>7 then come up with the name of the employee</p> <p>8 that's going to be impacted, right?</p> <p>9 A. Correct.</p> <p>10 Q. And then you give them the business</p> <p>11 case?</p> <p>12 A. The numeric value, yes, that's set up</p> <p>13 in the system, yes.</p> <p>14 Q. You set up one of these, the front</p> <p>15 page of Verizon-14, correct?</p> <p>16 A. Correct.</p> <p>17 Q. And then they go into system and</p> <p>18 they're supposed to input what they've already</p> <p>19 done on their own though, right?</p> <p>20 A. You would have to ask the hiring</p> <p>21 manager, in this case Brian, exactly what he</p> <p>22 did outside of the system. I wouldn't be able</p> <p>23 to provide that information.</p> <p>24 Q. So during his deposition, Mr. Magee</p>

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Pages 41 to 44

<p style="text-align: right;">41</p> <p>1 was looking at this same RIF documentation that</p> <p>2 you and I are looking at, and starting on Page</p> <p>3 147, Line 18, he says, I don't believe I typed</p> <p>4 any of that into the comments area. It could</p> <p>5 have been a verbal. I think she interviewed me</p> <p>6 over the phone. I don't recall. And I will</p> <p>7 check if I sent her an email, like with it</p> <p>8 written out, but I know it wasn't in the</p> <p>9 system. I had a phone call with Melissa where</p> <p>10 she, you know, questioned me on everything and</p> <p>11 whether that was she took that from our phone</p> <p>12 call or she asked me to email the information.</p> <p>13 Do you believe that he's inaccurate</p> <p>14 and that he, in fact, was the one who went into</p> <p>15 the system and inputted at all information?</p> <p>16 A. I don't recall.</p> <p>17 Q. So it could be what you said earlier,</p> <p>18 it could be what he's saying; you're just not</p> <p>19 sure?</p> <p>20 A. Can you restate that?</p> <p>21 Q. You said that you believe the manager</p> <p>22 went in and typed everything in based on the</p> <p>23 business case that you created, right?</p> <p>24 A. That is typically how it works, yes.</p>	<p style="text-align: right;">43</p> <p>1 Q. Did you ever get a list of names from</p> <p>2 him so you could go in and create your business</p> <p>3 cases?</p> <p>4 A. I received a consolidated list from</p> <p>5 Mike Pescatore.</p> <p>6 Q. Do you still have that list?</p> <p>7 A. Yes.</p> <p>8 Q. Where would you keep it?</p> <p>9 A. On my computer.</p> <p>10 Q. Just so I'm clear, step four is</p> <p>11 what's being done in the system, but based on</p> <p>12 your understanding, they have already rated and</p> <p>13 ranked their employees to come up with a</p> <p>14 particular name; is that fair?</p> <p>15 A. Yes.</p> <p>16 Q. Step 5, the director advises you via</p> <p>17 email when the cases are complete. Do you see</p> <p>18 that?</p> <p>19 A. Yes.</p> <p>20 Q. Did that transpire with Joe Muccilo?</p> <p>21 A. In this case I believe it came</p> <p>22 directly from Mike Pescatore.</p> <p>23 Q. Did you have any involvement or</p> <p>24 responsibility for counting how many people</p>
<p style="text-align: right;">42</p> <p>1 Q. Are you sure that that's how it</p> <p>2 happened with Mr. Magee?</p> <p>3 A. I don't recall.</p> <p>4 Q. Could you have had a telephone</p> <p>5 conversation with him and then just inputted</p> <p>6 information based on a phone call?</p> <p>7 A. It would be the information he</p> <p>8 provided if it happened that way, yes.</p> <p>9 Q. Do you do that with any of the</p> <p>10 individuals for the RIFs, talk to the manager</p> <p>11 over the phone and then just input the</p> <p>12 information in yourself?</p> <p>13 A. I don't recall. I do way too many of</p> <p>14 these.</p> <p>15 Q. Is that ever your practice?</p> <p>16 A. I don't recall.</p> <p>17 Q. What your practice is?</p> <p>18 A. Typically, that is not how it's done.</p> <p>19 Q. Parker-1, you asked for the names by</p> <p>20 the close of business that following Wednesday,</p> <p>21 which would be 4/1/15. Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Did he meet that deadline?</p> <p>24 A. I don't recall.</p>	<p style="text-align: right;">44</p> <p>1 were actually impacted or was it your job to</p> <p>2 just make sure the business cases were created</p> <p>3 and properly filled out and reviewed?</p> <p>4 A. Can you restate that?</p> <p>5 Q. Other than ensuring that the business</p> <p>6 cases were created, properly filled out and</p> <p>7 then reviewed, what other responsibility, if</p> <p>8 any, did you have with factoring headcount or</p> <p>9 percentages of individuals retained?</p> <p>10 A. I don't have any responsibility in</p> <p>11 deciding the number of people that are impacted</p> <p>12 during this particular round. I did keep track</p> <p>13 of it on a spreadsheet.</p> <p>14 Q. Do you still have that spreadsheet?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know if it was 12 that were</p> <p>17 impacted within Muccilo's organization?</p> <p>18 A. I don't recall.</p> <p>19 Q. Do you remember if it was as many as</p> <p>20 200?</p> <p>21 A. In Joe's organization, it would not</p> <p>22 have been that number.</p> <p>23 Q. It was on your spreadsheet though,</p> <p>24 the number that were ultimately impacted?</p>

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Pages 45 to 48

<p style="text-align: right;">45</p> <p>1 A. It was not at the director level. 2 Oh, on this spreadsheet, yes, in front of us. 3 MR. BARRAS: Why don't we be 4 clear, what spreadsheet are you 5 referring to? 6 BY MS. BURKE: 7 Q. She's talking about 2651, all these 8 blue columns here. 9 A. The one on -- 10 Q. Do you see it says 2651? 11 A. Yes, sorry, the number of employees 12 -- the names would have been on there so you 13 would be -- 14 Q. This is the blank one, right, but you 15 ended up getting a completed one back? 16 A. Correct. 17 Q. You didn't have any actual role or 18 involvement in identifying who would be 19 impacted or what their scores would be, did 20 you? 21 A. No. 22 Q. In order for a manager to determine 23 if any discipline impacted a particular 24 employee, what would they have to do to find</p>	<p style="text-align: right;">47</p> <p>1 would be an area in the system that would 2 reflect if the business case was approved; is 3 that right? 4 A. I didn't hear you, I'm sorry. 5 Q. Are you on Verizon-14, Page 755? 6 A. Yes. 7 Q. There would be an area that would 8 identify if the business case was, in fact, 9 approved? 10 A. Yes. 11 Q. If it says self approved and it has 12 your name here, next to it says approved 13 Harvey, and I think someone said his name 14 earlier, Reingold? 15 MS. NERO: Rumeld, R-U-M-E-L-D. 16 BY MS. BURKE: 17 Q. What does this reflect? 18 A. This reflects that I approved the 19 case and that Harvey in legal approved it as 20 well. 21 Q. Do you know who Diane Redilla is? 22 A. I know her name. 23 Q. Did you receive any information from 24 her directly in relation to preparing your</p>
<p style="text-align: right;">46</p> <p>1 that? 2 A. They would have their own employee 3 record if they did a written warning or 4 something like that. 5 Q. So they would just have to be candid 6 about what the score was? 7 A. Yes. 8 Q. You weren't cross referencing that, 9 were you? 10 A. If there was something provided in 11 that column, then we would have the discussion 12 about it, yes. 13 Q. Did you even cross reference every 14 time there was a zero put there? 15 A. No. 16 Q. You referenced this earlier, 17 employees in the Mudge organization, that was 18 for the individual above Bill Bragg, right? 19 A. Bob Mudge is the executive vice 20 president. 21 Q. He was over Bill Bragg? 22 A. Ultimately, yes. 23 Q. Can you just use Page 1 as an 24 example, we're on Verizon-14, Page 755, there</p>	<p style="text-align: right;">48</p> <p>1 business cases? 2 A. I don't recall. 3 Q. For the employees, using Page 798 as 4 an example, was their job entry date something 5 that automatically populated or is that 6 something that the manager would input? 7 A. That is automatically populated. 8 Q. Same thing with location description? 9 A. Yes. 10 MS. BURKE: Ms. Parker, I don't 11 have any further questions for you. 12 Your counsel may have some follow-up 13 and he may not. 14 MR. BARRAS: I don't have 15 anything. 16 * * * 17 (Witness excused.) 18 * * * 19 (Deposition concluded at 20 1:15 p.m.) 21 * * * 22 23 24</p>

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1 * * *

2 C E R T I F I C A T I O N

3 * * *

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6 of Pennsylvania, do hereby certify the
7 foregoing to be a true and accurate transcript
8 of my original stenographic notes taken at the
9 time and place hereinbefore set forth.

10

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Exhibit TT



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June 10, 2016

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**Re: Suzette Walker v. Verizon et al.
Civil Action No. 15-4031**

Dear Counsel:

Please accept this letter in response to your April 21, 2016 communication regarding the above-captioned matter. Defendants in good faith hereby respond and supplement, where applicable, Defendants' Responses to Plaintiff's Discovery Requests, as follows:

- **Response to Interrogatory No. 6:** Defendants will provide the dates of employment, age, race, and status as an individual with a disability for the individuals listed in RIF Business Case No.: RIFV102777 in response to Interrogatory No. 6. The individuals listed in the Business Case No. RIFV102777 are the Engineering III Specialists that were supervised by either Brian Magee or Carl Gross, under Director Dennis Muccillo. The information is not based strictly upon a single location, but is based on a position title and band level under a given Director. Thus for purposes of the reduction in force decision, Plaintiff was compared against other Engineering III Specialists (Band 7T) that reported to managers under Director Dennis Muccillo.
- **Response to Interrogatory No. 7:** Please see Defendants' response to Interrogatory No. 6, above.
- **Response to Interrogatory No. 8:** Per our phone conversation on June 10, 2016, Defendants will also produce information regarding all individuals within Director Dennis Muccillo's organization who were separated as part of the March – April 2015

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June 10, 2016

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Reduction in Force, along with their dates of employment, ages, race, and status as an individual with a disability.

- **Response to Interrogatory No. 9:** I believe we have produced the information requested in this Interrogatory. Please confirm whether there is any documentation or information outstanding that you have requested.
- **Response to Document Request No. 5:** Defendants renew and restate their objections to this Request, nevertheless Defendants will supplemental with Plaintiff's performance reviews for 2010, 2011, and 2012.
- **Response to Document Request No. 9:** Defendants are conducting e-discovery in accordance with the terms discussed and agreed to between the parties and will produce non-privileged documents responsive to Plaintiffs' search terms and relevant to Plaintiffs' claims.
- **Response to Document Request No. 10:** Defendants refer Plaintiff to their response to Interrogatory Nos. 6 and 7, above. Defendants request, based upon its response to Interrogatory Nos. 6 and 7 above, that Plaintiff clarify the documents Plaintiff is requesting in response to Document Request No. 10.
- **Document Request No. 11:** Defendants renew and restate their objections to this Request, and specifically note that Plaintiff has failed to identify how Defendants' response to this Request is deficient. Defendants will produce documents reflecting any and all job postings or positions advertised for hire or transfer within Dennis Muccillo's organization from January 1, 2015 through present.
- **Document Request No. 12/14:** Defendants are conducting e-discovery in accordance with the terms discussed and agreed to between the parties and will produce non-privileged documents responsive to Plaintiffs' search terms and relevant to Plaintiffs' claims.
- **Document Request No. 15:** Defendants renew and restate their objections to this Request. Specifically, the request is unduly burdensome as Defendants have engaged in a number of reductions unrelated Director Dennis Muccillo's organization. Separation decisions for reductions in force are made within each individual organization. As such, producing the requested information from January 1, 2014 through July, 2015 for all reductions in force outside of Dennis Muccillo's organization is unduly burdensome. Nevertheless, Defendants will produce non-privileged responsive documents for reductions in force within Dennis Muccillo's organization from January 1, 2014 through July 1, 2015.

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- **Document Request No. 18:** Defendants are conducting e-discovery in accordance with the terms discussed and agreed to between the parties and will produce non-privileged documents responsive to Plaintiffs' search terms and relevant to Plaintiffs' claims.

As we have repeatedly stated, please give us a call to discuss any specific concerns you have about our discovery responses. We are confident we can resolve any outstanding issues without resorting to threats of sanctions or motions practice that will distract from the substance of the litigation and waste the Court's and our time.

Sincerely,

/s/ Joel S. Barras

Joel S. Barras

cc: Valerie E. Brown, Esq.
Adam C. Lease, Esq.

Exhibit UU

Exhibit UU

(provided to the Court via CD, containing
VZ_Walker_818(2)

Exhibit VV

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Re: Suzette Walker v. Verizon et al.
Civil Action No. 15-4031

Dear Counsel:

Please accept this letter in response to your March 23, 2016 communication regarding the above-captioned matter. Please find attached Defendants' document production bate-stamped Def_Walker_018-023, as well as Def_Walker_107-113. As a general matter, your deficiency letter does not specifically address why you find Defendants' responses to be deficient and do not challenge Defendants' objections to Plaintiff's Interrogatories or Requests, or the specific deficiency in the factual answer or documents provided. Nevertheless, Defendants in good faith hereby respond and supplement, where applicable, Defendants' Responses to Plaintiff's Discovery Requests, as follows:

- **Response to Interrogatory No. 4:** Defendants renew and restate their objections to this Interrogatory. Defendants are not aware of, and did not base their decision to select Plaintiff for separation as part of the Reduction in Force on, any verbal or written discipline issued to Plaintiff.
- **Response to Interrogatory No. 5(B):** Defendants renew and restate their objections to this Interrogatory, and specifically note that Plaintiff has failed to identify how Defendants' answer to this Interrogatory is deficient. By way of further answer, see Def_Walker_018-023 and Def_Walker_107.
- **Response to Interrogatory No. 6:** Defendants renew and restate their objections to this Interrogatory. By way of further answer, see Def_Walker_018-023. Defendants have not transferred any employees into the Engineering III Specialist title at the 900 Race

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Street location since Plaintiff's separation. There have been no requisitions for the Engineering III Specialist title at the 900 Race Street location since Plaintiff's separation.

- **Interrogatory No. 7:** Defendants renew and restate their objections to this Interrogatory. By way of further answer, see Def_Walker_018-023. By way of further answer, Defendants have not transferred any employees into the Engineering III Specialist title at the 900 Race Street location since Plaintiff's separation. There have been no requisitions for the Engineering III Specialist title at the 900 Race Street location since Plaintiff's separation.
- **Interrogatory No. 8:** Defendants renew and restate their objections to this Interrogatory, and specifically note that Plaintiff has failed to identify how Defendants' answer to this Interrogatory is deficient. By way of further answer, see Def_Walker_018-023.
- **Interrogatory No. 9:** Defendants renew and restate their objections to this Interrogatory, and specifically note that Plaintiff has failed to identify how Defendants' answer to this Interrogatory is deficient. By way of further answer, Defendants will produce personnel files, performance evaluations and compensation information for the individuals against whom Plaintiff was compared for purposes of selection for separation as part of the Reduction in Force.
- **Document Request No. 9:** Defendants renew and restate their objections to this Request. By way of further response, it is unclear what Plaintiff considered to be "incomplete" about their response to this Requests. Plaintiff's manager did not maintain a hard copy personnel file for Plaintiff. Defendants have produced electronic records relating to Plaintiff that are in Defendants possession. Defendants will continue to engage in a reasonable search of its records and supplement if Defendants discover any additional non-privileged, relevant and responsive documentation.
- **Document Request No. 10:** Defendants renew and restate their objections to this Request, and specifically note that Plaintiff has failed to identify how Defendants' response to this Request is deficient. By way of further answer, see Def_Walker_018-023.
- **Document Request No. 11:** Defendants renew and restate their objections to this Request, and specifically note that Plaintiff has failed to identify how Defendants' response to this Request is deficient. Defendants have not transferred any employees into the Engineering III Specialist title at the 900 Race Street location since Plaintiff's separation. There have been no requisitions for the Engineering III Specialist title at the 900 Race Street location since Plaintiff's separation.
- **Document Request No. 12:** Defendants renew and restate their objections to this Request, and specifically note that Plaintiff has failed to identify how Defendants' response to this Request is deficient. By way of further response, see Def_Walker_018-

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023 and Def_Walker_107. Defendants are continuing to search their systems for any electronic communications discussing Plaintiff's separation from employment and will produce non-privileged, relevant and responsive documentation that it discovers.

- **Document Request No. 14:** Defendants renew and restate their objections to this Request. By way of further answer, Defendants are gathering and will produce personnel files, performance evaluations and compensation information for the individuals against whom Plaintiff was compared for purposes of selection for separation as part of the Reduction in Force.
- **Document Request No. 15:** Defendants renew and restate their objections to this Request, and specifically note that Plaintiff has failed to identify how Defendants' response to this Request is deficient. By way of further answer, see Def_Walker_018-023.
- **Document Request No. 18:** Defendants renew and restate their objections to this Request. By way of further response, see Defendants' document production at Def_Walker_108-113. Defendants have requested and are gathering additional documents responsive to this request and will supplement its production with non-privileged, responsive documents.

In addition, as discovery is ongoing, Defendants are preparing a supplemental production containing personnel documents for the employees against whom Ms. Walker was compared for purposes of the Reduction in Force, and have requested Plaintiff's disability file from Defendants' vendor, MetLife. As I have repeatedly stated, please give me a call to discuss any specific concerns you have about our discovery responses. I am confident we can resolve any outstanding issues without resorting to threats of sanctions or motions practice that will distract from the substance of the litigation and waste the Court's and our time.

Sincerely,

/s/ Joel S. Barras

Joel S. Barras

cc: Valerie E. Brown, Esq.
Adam C. Lease, Esq.